IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

EAGLE SUSPENSIONS, INC.,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Civil Action No. 3:12-CV-00611-G
	§	
HELLMANN WORLDWIDE	§	JURY
LOGISTICS, INC.,	§	
	§	
Defendant.	§	

PLAINTIFF'S APPENDIX IN SUPPORT OF ITS MOTION FOR ATTORNEYS' FEES AND COSTS

TO HONORABLE UNITED STATES SENIOR DISTRICT JUDGE A. JOE FISH:

Plaintiff Eagle Suspensions, Inc. ("Eagle") files this Appendix in Support of Its Motion for Attorneys' Fees and Costs and incorporates the evidence presented in this Appendix into Its Motion for Attorneys' Fees and Costs as if fully set forth therein.

Respectfully submitted,

/s/ W. Craig Stokley

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ATTORNEYS FOR PLAINTIFF EAGLE SUSPENSIONS, INC.

CERTIFICATE OF SERVICE

I hereby certify that on April 24, 2013, I electronically filed the foregoing document via the MC/ECF electronic filing system and served all counsel of record pursuant to Local Rule 5.1(d) and Fed. R. Civ. P. 5(b)(2)(E).

/S/ W. CRAIG STOKLEY

W. CRAIG STOKLEY

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

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§ JURY
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PLAINTIFF'S APPENDIX IN SUPPORT OF ITS MOTION FOR ATTORNEYS' FEES AND COSTS

Tab / Exhibit	Appx. #	Description
Tab 1	1-18	Declaration of W. Craig Stokley
Exhibit A	19-21	Firm Resume for W. Craig Stokley
Exhibit B	22-100	Attorney Fee Invoices from Riney Palter PLLC and Palter Stokley Sims Wright PLC
Exhibit C	101-103	Firm Resume of John T. Palter
Exhibit D	104-105	Firm Resume of Nathanial Martinez
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Exhibit F	108-163	Summary of Costs with Supporting Documentation
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TAB 1

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

EAGLE SUSPENSIONS, INC.,	§
Plaintiff,	§ § §
v.	§ Civil Action No. 3:12-CV-00611-G
	§
HELLMANN WORLDWIDE	§ JURY
LOGISTICS, INC.,	§
Defendant.	§ §

DECLARATION OF W. CRAIG STOKLEY

- 1. My name is W. Craig Stokley. I am over the age of 21, am of sound mind, and suffer from no legal or mental disabilities. I have never been convicted of a felony or of a crime involving moral turpitude. I am fully competent to testify on the facts stated herein, which are within my personal knowledge, and are true and correct. I submit this declaration in support of Plaintiff Eagle Suspensions, Inc.'s ("Eagle") Motion for Attorneys' Fees ("Motion").
- 2. I am a member of Palter Stokley Sims Wright, PLLC ("PSSW"), attorneys for Plaintiff Eagle in this matter. I am the lead attorney of record for Eagle in the above-styled lawsuit.
- 3. I have practiced litigation in Dallas, Texas, since 2006. Prior to that time, I spent one year as a law clerk to the United States District Judge A. Joe Fish in Dallas, Texas. I received a J.D. from Georgetown University Law Center and was admitted to the State Bar of Texas in 2005. I am admitted to practice before the United States District Court for the Northern, Southern, Eastern, and Western Districts of Texas as well as the Supreme Court of the United States of America. Since 2006, my practice has almost exclusively been business

litigation. I have represented a variety of clients in numerous lawsuits in both state and federal courts. Generally speaking, I spend an equal amount of time in state and federal court and on both sides of the docket. I have litigated matters pending in Texas as well as other states. I have represented companies or individuals located in various parts of the United States. I have represented all types of business entities, ranging from Fortune 500 corporations to individual entrepreneurs and professionals. I have litigated matters in federal court involving contract disputes, the Federal False Claims Act, class actions, intentional torts, and intellectual property. I have litigated cases with millions of dollars in dispute all the way down to routine contract disputes involving thousands of dollars. For the last three years, I have served as Court-Appointed Mediator for cases pending before Judge Fish. My firm resume is attached hereto and incorporated by reference herein as Exhibit A.

- 4. In or about the summer of 2011, a law firm I was previously associated with, Riney Palter, PLLC ("Riney Palter"), was retained by Eagle to represent Eagle in connection with lost shipment of two large industrial presses in Mexico. At that point, Eagle was not a preexisting client of Riney Palter. Eagle was seeking legal advice on how to recover the shipment, because the efforts with the shipping company, Hellmann, were proving unfruitful. I assisted Eagle with a pre-suit investigation of its claims. As part of that investigation, I deposed Hellmann's Corporate Representative, David Kang. Based on Mr. Kang's testimony and our investigation, I was ultimately retained by Eagle to file a lawsuit against Hellmann for losing the shipment. It should be noted that the engagement was based on fixed, standard hourly rates, and payment was not contingent on the outcome of the case.
- 5. In late December 2012, as this case was gearing up for trial, I left Riney Palter to form a new law firm, PSSW. With Eagle's written approval, PSSW took over the engagement

with Eagle and Eagle's files were also transferred to PSSW.

- 6. In 2012, I was at full capacity and unable to take on any additional work. By way of example, in addition to the work on this case, I billed in excess of 2500 hours for my clients in 2012. Therefore, preparation and trial of Eagle's claims against Hellmann limited the ability of the attorneys practicing at PSSW to accept new cases, particularly as this case became more time consuming.
- 7. Attorneys and legal professionals at Riney Palter and PSSW kept contemporaneous records of the professional time spent representing Eagle in this matter and recorded that time in one tenth of an hour increments. Riney Palter and PSSW then regularly billed Eagle at the law firms' standard hourly rates for the legal services rendered, and also billed Eagle for the expenses incurred. True and correct copies of the fee statements reflecting the time spent by Riney Palter and/or PSSW and expenses incurred by each law firm on Eagle's behalf through April 11, 2013 are attached hereto and incorporated by reference herein as **Exhibit B**. These fee statements have been redacted where appropriate to protect the attorney-client privilege. I am a custodian of record for PSSW and have reviewed the records contained in **Exhibit B**, which comprise business records of PSSW, as they: (1) were made at or near the time of the acts, events, conditions and opinions therein occurred; (2) were made by, or from information transmitted by, a person with knowledge of the events or conditions recorded; (3) were kept in the regular course of PSSW's business; and (4) it was in the regular course of PSSW's business to make those records.
- 8. As indicated in the fee statements, through April 11, 2013, I worked approximately 579.7 hours on this matter for a total amount of \$144,925, with the amount actually billed to Eagle of \$130,075. This amount comprises 520.3 hours of my time at an

hourly rate of \$250. My time comprises the majority of the time incurred in this case, as I am lead counsel for Eagle in this matter and have been responsible for all decisions made on Eagle's behalf in connection with prosecuting Eagle's claims against Hellmann, from pre-litigation investigation through trial. In this regard, I (1) took or defended seven depositions in this case; (2) oversaw all decisions concerning this case; (3) review, drafted, and/or revised all papers filed with the Court; (4) frequently communicated with Eagle representatives; and (5) was lead counsel at trial. I review and edited all Riney Palter and PSSW fee statements in this matter before they were billed to Eagle. In doing so, and in exercising my judgment, I wrote down/off certain portions of my time to account for interoffice conferences, duplication of attorney time, or when certain matters took significantly longer than initially anticipated.

9. In addition, the following attorneys at Riney Palter and PSSW have worked on this matter since May 31, 2011, in the following capacities and at the hourly rates and amounts as set for the in **Exhibit B**:

a. John T. Palter

Mr. Palter was a founding member of Riney Palter, and is also a founding member of PSSW. Mr. Palter's firm resume is attached hereto as incorporated by reference herein as **Exhibit C**. As set forth therein, Mr. Palter has more than twenty years of experience advocating the interests of individual, emerging growth, and institutional clients in complex commercial, employment and intellectual property disputes. Mr. Palter has served as lead and local counsel in numerous jury and bench trials and arbitrations in cases involving securities, accounting, intellectual property, copyright and trademark infringement, trade secrets, non-compete agreements, employment, insurance coverage, oil and gas, dissenter's rights, deceptive trade practices, quasi-torts, and pre- and post-judgment collections. Mr. Palter graduated from Drake

University School of Law in 1985 and is admitted to practice in the State of Texas, State of New Mexico, United States Supreme Court, United States Court of Appeals for the Second Circuit, Fifth Circuit, and Federal Circuit, as well as the United States District Courts for the Northern, Southern, Eastern, and Western Districts of Texas. As reflected in the attached fee statements, through April 11, 2013, Mr. Palter has spent approximately 11.2 hours on this matter for a total amount billed to Eagle of \$3,701. For this case, Mr. Palter's hourly rate ranged from \$375 to \$395. The nature of Mr. Palter's representation focused mainly on the high-level strategy involved in taking this case to trial. It is my opinion that Mr. Palter's strategic advice was important to the successful outcome of this matter.

b. Nathanial L. Martinez

Mr. Martinez is an associate at PSSW. Mr. Martinez's firm resume is attached hereto and incorporated by reference herein as **Exhibit D**. As set forth therein, Mr. Martinez (1) earned his bachelor's degree in government, with a minor in philosophy from the University of Texas at Austin in 2006, and his law degree from the J. Reuben Clark Law School at Brigham Young University in 2010; (2) was a member of the *BYU Law Review* and Moot Court Board of Advocates; (3) was admitted to the State Bar of Texas in 2010; and (4) primarily practices business law. As reflected in the attached fee statements, through April 11, 2013, Mr. Martinez has spent approximately 427.5 hours on this matter for a total of \$96,187.50. Mr. Martinez's hourly rate on this case was \$225. \$81,405 comprising 361.8 hours of Mr. Martinez's time was actually charged to Eagle, so that any duplication, training time, and/or interoffice conference time was not charged if it was not appropriately charged. Mr. Martinez's representation began in September 2012, when he was hired by Riney Palter, and continued through trial with PSSW. It is my opinion that Mr. Martinez's legal research and analysis, as well as his active participation

at trial was particularly important to the successful outcome of this matter.

c. Mahsa Soheil

Ms. Soheil was an associate at Riney Palter until the fall of 2012, when she left and subsequently began working for a different firm in Dallas, Texas. I understand that Ms. Soheil currently works for the law firm Dentons and Ms. Soheil's firm resume from Dentons' website is attached hereto and incorporated by reference herein as **Exhibit E**. As set forth therein, Ms. Soheil (1) earned her bachelor of science, *summa cum laude*, in finance from the University of Miami in 2006, and she graduated from Tulane University Law School in 2011; (2) was Managing Editor of the *Tulane Maritime Law Journal*; and (3) was admitted to the State Bar of Texas in 2011. As reflected in the attached fee statements, through April 11, 2013, Ms. Soheil spent approximately 70.2 hours on this matter for a total of \$12,285. Ms. Soheil's hourly rate charged on this case was \$175. Only \$3,272.50 comprising 18.7 hours of Ms. Soheil's time was actually charged to Eagle, so that any duplication or training time due to her level of experience was not charged. It is my opinion that the research and drafting by Ms. Soheil that was billed to the client was important to the successful outcome of this matter.

d. Theodore J. Riney and Bruce Packard

Mr. Riney and Mr. Packard are licensed attorneys in the State of Texas and each have more than 20 years of legal experience. From time to time in this case, Mr. Riney and/or Mr. Packard were consulted for strategic advice related to Eagle's prosecution of this case. As reflected in the fee statements, through April 11, 2013, Mr. Riney spent less than one hour on this case for a value of \$150. Mr. Riney's hourly rate charged on this case was \$375. As reflected in the fee statements, through April 11, 2013, Mr. Packard spent less than two hours on this case for a value of \$675. Mr. Packard's hourly rate charged on this case was \$375. It is my

opinion that Mr. Riney and Mr. Packard's strategic advice on those matters was important to the successful outcome of this matter.

- 10. Paralegal time on this case consisted of approximately 154.6 hours for a value of \$23,197.50, for which only 141.2 hours or \$21,187.50 was actually billed to Eagle. The legal paralegal hourly rates charged in this case were \$150-\$175, which are usual and customary and consistent with the market rates in Dallas County, Texas. This time was primarily incurred investigating Hellmann's corporate structure and in assisting with the preparation of exhibits to be used during depositions and at trial as well as the trial presentation of exhibits. These paralegals worked under my direct supervision on this matter. These paralegals are qualified to work on this case based on their education, training, knowledge, and experience. It is my opinion that the fees incurred by Riney Palter/PSSW paralegals are reasonable and necessary.
- 11. As lead counsel, I am responsible for staffing this case. The attorneys and paralegals mentioned herein who worked on the case were brought in to work on the case for specific reasons as evidence in the fee statements to Eagle and as set forth therein. *See* Exhibit B. Mr. Packard, Mr. Riney, and Mr. Palter were involved in high level advisory roles in this matter. Ms. Soheil was only involved in the legal research and analysis, as well as some drafting of discovery requests, pursuant to her level of experience. When Mr. Martinez was hired in September 2012, he was given a lot of responsibility in the case and helped take the case to a successful jury verdict. Where appropriate, attorney time was written down prior to being charged to Eagle to reflect my billing judgment as discussed herein. In sum, it is my opinion that Eagle properly staffed this case.
- 12. Through April 11, 2013, the total value of attorneys' time (including paralegal time) spent on behalf of Eagle in this matter is \$281,828, comprising approximately 1245.4

hours. Of that amount, PSSW/Riney Palter has billed Eagle \$240,466, comprising approximately 1053.6 hours as set forth below:

Attorney	Hourly Rates	Hours	Value of	Hours	Amounts
	_	Worked	Services	Charged	Charged
W. Craig Stokley	\$250	579.7	\$144,925.00	520.3	\$130,075.00
John T. Palter	\$375-\$395	11.2	\$4,408.00	9.4	\$3,701.00
Nathanial L. Martinez	\$225	427.5	\$96,187.50	361.8	\$81,405.00
Mahsa Soheil	\$175	70.2	\$12,285.00	18.7	\$3,272.50
Alex Gamino	\$150	154.3	\$23,145.00	140.9	\$21,135.00
Theodore J. Riney	\$375	.4	\$150.00	.4	\$150.00
Bruce K. Packard	\$375	1.8	\$675.00	1.8	\$675.00
Stormy Young	\$175	.3	\$52.50	.3	\$52.50
Totals		1245.4	\$281,828.00	1053.6	\$240,466.00

Eagle seeks to recover from Hellmann the \$240,466 which Eagle has been billed, plus the additional amounts discussed below in connection with the preparation of Eagle's attorneys' fees motion (and any conditional appellate fees). It is my expert opinion that the \$240,466 in attorneys' fees incurred by Eagle's counsel and billed to Eagle as of April 11, 2013 are usual and customary. It is also my opinion that these fees were reasonable and necessary for the successful prosecution of Eagle's breach of contract, breach of fiduciary duties, and federal common law non-delivery claims against Hellmann. As set forth in the fee statements in Exhibit B, this time includes, but is not limited to, time for:

- a. research and analysis of the factual and legal background of Eagle's claims against Hellmann;
- b. research and analysis regarding potential remedies available to Eagle;
- research and analysis regarding potential counterclaims and defenses available to Hellmann;

- d. consulting with clients to discuss the course of action and potential remedies available;
- e. preparing and sending demand letters and other correspondence to Hellmann on behalf of Eagle;
- f. preparing and serving Eagle's original petition and amended complaint;
- g. reviewing Hellmann's answer;
- h. multiple communications, both oral and written, with clients;
- i. multiple communications, both oral and written, with attorneys representing Hellmann;
- j. preparing written discovery requests to Hellmann;
- k. reviewing documents produced by Hellmann;
- 1. reviewing Hellmann's written discovery responses;
- m. preparing Eagle's disclosures and reviewing Hellmann's disclosures;
- n. reviewing Orders from the Court;
- o. scheduling party and non-party depositions and mediation;
- p. preparing for depositions;
- q. analysis of and then preparing and filing Eagle's motion for summary judgment, brief in support, and appendix in support;
- r. conferring with clients regarding their depositions;
- s. representing clients in their depositions;
- t. responding to Hellmann's document requests;
- u. reviewing and analyzing document produced by Norman G. Jensen;
- v. traveling to and from Laredo, Texas for the deposition of Jose D. Martinez, an

- employee of Norman G. Jensen.;
- w. reviewing Hellmann's motion for continuance and motion to extend discovery deadlines;
- x. reviewing Hellmann's motion for summary judgment, brief in support, and appendix in support;
- y. preparing and filing a response to Hellmann's motion for summary judgment and motion to strike Hellmann's summary judgment evidence;
- z. reviewing Hellmann's response to Eagle's motion for summary judgment;
- aa. communications with the mediator, preparing for mediation, and then attending mediation;
- bb. reviewing transcripts of the multiple depositions taken in this case;
- cc. preparing and then filing Eagle's reply in support of its motion for summary judgment;
- dd. reviewing and redacting attorneys' fees statements in order to produce to Hellmann;
- ee. updating Eagle's disclosures;
- ff. preparing pretrial disclosures;
- gg. reviewing Hellmann's reply in support of its motion for summary judgment;
- hh. preparing and filing a response to Hellmann's untimely reply brief and new arguments therein;
- ii. reviewing Hellmann's pretrial disclosures;
- jj. preparing for the Court-ordered settlement conference;
- kk. reviewing emails and correspondent regarding Court-ordered settlement

conference;

- ll. reviewing the Court's Order on the parties' motion for summary judgment;
- mm. preparing for trial, including but not limited to:
 - 1) identifying and then organizing exhibits to be used at trial;
 - 2) reviewing deposition transcripts in order to identify portions to use during examination of witnesses not present at trial and portion to use for impeachment of live witnesses;
 - 3) identifying and developing demonstrative evidence to use at trial;
 - 4) working on presentation of videotapes depositions and exhibits in electronic format;
 - 5) preparing witnesses to present at trial, including annotated outlines of those witnesses' testimony;
 - 6) preparing cross examination outlines for hostile witnesses;
 - 7) reviewing the Court's Orders concerning trial;
 - 8) preparing all of the pretrial papers, including exhibit list, witness list, deposition designations, proposed findings of fact and conclusions of law, and Joint Pretrial Order;
 - 9) meeting and conferring with counsel for Hellmann on the pretrial materials;
 - 10) reviewing Hellmann's pretrial materials, including its numerous trial briefs, to which Eagle filed an omnibus response;
 - 11) attending the pretrial conference;
 - 12) shortening Eagle's trial presentation to comply with the time limits ordered by the Court at the pretrial conference; and
 - 13) preparing opening and closing arguments.
- nn. participating in a three day jury trial before the Court;
- oo. analyzing the jury's verdict following trial; and
- pp. analyzing certain post-trial matters.
- 13. Furthermore, since April 11, 2013, Eagle has incurred additional attorneys' fees in

connection with the preparation of Eagle's motion for attorneys' fees. Before incurring these additional attorney fees, I conferred with counsel for Hellmann in an attempt to reach agreement on the attorney fee amounts in this case. Hellmann was not agreeable to the relief requested. Furthermore, I offered to recommend a modest reduction in the total amount owed in exchange for an agreed upon payment date. Again, Hellmann was not agreeable to this proposal. As a result, Eagle was forced to incur additional fees preparing and submitting this motion for attorneys' fees.

- 14. I have reviewed and evaluated the current time incurred by attorneys at PSSW in connection with the preparation of Eagle's Motion from April 11, 2013 through the date of this declaration. A bill, which reflects such charges, will be sent to Eagle. Such time was all incurred under my direction as necessary to prepare the motion and supporting documentation. Attorneys at the firm, including me (\$250) and Mr. Martinez (\$225), as well as a firm paralegal (\$150) have spent not less than a total of 67.8 hours at the foregoing hourly rates at a total cost of not less than \$15,168 in conducting research for the Motion, drafting the Motion, and preparing and coordinating the evidence to support the Motion. It is my opinion that these fees are usual and customary. It is also my opinion that these attorneys' fees are reasonable and necessary to the preparation of this motion and should be recovered by Eagle herein, especially considering that Hellmann had the opportunity to avoid any of these fees.
- 15. In considering the reasonableness and necessity of Eagle's fee request in this case, it is important to note that after trial the jury found in favor of Eagle on all of its claims, and awarded Eagle damages based on the theories it advanced (i.e., replacement costs and loss of use). Specifically, the amount awarded pursuant to the Jury's Verdict and this Court's Final Judgment far exceeded the damages that Eagle initially sought from Hellman (i.e., the cost for

the lost cargo). Accordingly, Hellmann could have easily avoided all of the attorneys' fees sought by Eagle if Hellmann had simply paid the amount at the outset of this case. In addition, Eagle set out its case in its summary judgment briefing which was filed well in advance of trial and before thousands of additional dollars in attorneys' fees had been incurred. But, rather than resolving the case at that time, Hellmann pressed forward with expensive discovery and another round of summary judgment briefing. All of this added to the attorneys' fees Eagle had to incur in attempting to get this matter finally resolved. While Hellmann had the right to defend itself if it chose to do so, it has been the defensive hurdles by Hellmann in this case which have caused Eagle's attorneys' fees. Indeed, although Eagle's theory of the case never changed from the time it filed suit, Hellmann's litigation strategy forced Eagle to incur substantial attorneys' fees that approached the amount of the Court's Judgment and eclipsed the damages Eagle originally sought from Hellmann. At each step of the way, Eagle attempted to bring this matter to conclusion as expeditiously as possible, e.g., through (1) its demand letter on June 15, 2011, (2) filing a straight-forward lawsuit on February 29, 2012, (3) filing a comprehensive summary judgment motion on its entire case in compliance with the Court's dispositive motion deadline and well in advance of trial, (4) never seeking a continuance of the trial date, (5) opposing Hellmann's motion for continuance, and (6) requesting the earliest available trial date allowed by the Court at the pretrial conference on February 8, 2013 (with the trial commencing the following Monday).

16. From the outset, it appears that Hellmann's strategy was to delay the litigation and confuse the issues before the Court through its inconsistent legal theories and defenses. For example, after this lawsuit was filed on February 29, 2012, Hellmann sought no discovery from Eagle at all for *almost seven months* – the only discovery it sought was one third-party

deposition. Finally, with just over 30 days remaining in the discovery period, Hellmann served its first discovery requests on Eagle by serving a litany of interrogatories, requests for admission, requests for production, and three deposition notices to occur the last three days of discovery. Then, in an apparent attempt to circumvent the Court's scheduling order, Hellmann moved for an extension of the discovery deadline and continuance of the case.

- effort to avoid Eagle's claims. All of this added to the attorneys' fees Eagle had to incur to bring this matter to judgment. To make matters worse, the legal theories presented in Hellmann's initial motion for summary judgment morphed into new, untimely affirmative defenses by the reply briefing. For example, Hellmann raised *for the first time* during its reply briefing (which was filed 9 days late) completely new and unpled defenses, thus prompting Eagle to incur additional legal fees to seek leave to file a sur-reply brief and respond to Hellmann's untimely reply brief. Ultimately, the court was not persuaded by Hellmann's legal maneuvering. While Hellmann had the right to defend itself if it chose to do so, it was the defensive hurdles manufactured by Hellmann which have caused many of the attorney's fees incurred by Eagle. Hellmann's litigation strategy forced Eagle to go all the way through a costly trial in order to recover the damages Eagle had suffered and demanded for in advance of litigation. Therefore, in light of the circumstances created by Hellmann, I believe the attorneys' fees sought by Eagle were and are reasonable and necessary.
- I am familiar with hourly rates charged by attorneys in Dallas County for business litigation matters in both state and federal court, including matters similar to this case, as well as for general business matters. I am familiar with these types of hourly rates of first year associates up to senior partners at various law firms, as well as paralegals, including those in

Dallas County. It is my opinion that the hourly rates charged to Eagle in this lawsuit are usual and customary rates in Dallas County for similar work. Thus, it is my opinion that the rates are reasonable.

19. In addition to attorneys' fees, Eagle has also incurred recoverable costs. True and correct copies of the supporting documentation for Eagle's recoverable costs are attached hereto and incorporated by reference herein as **Exhibit F**. A chart summarizing these costs is set forth below:

Taxable Expenses:	Amount:
Filing Fees	\$607.00
Process Service	\$2,449.46
Court Reporters	\$3,401.56
Copy Service	\$640.65
Delivery Service	\$192.94
Federal Express	\$65.82
Secretary of State	\$6.00
Travel Expenses	\$858.42
Trial Supplies	\$221.66
TOTAL TAXABLE COSTS	\$8,443.51

20. Accordingly, through the date of this declaration, Eagle seeks to recover from Hellmann in this case total attorneys' fees in the amount of \$255,634 and total recoverable costs in the amount of \$8,443.51. It is my opinion that these attorneys' fees and costs are usual and customary. It is also my opinion that these attorneys' fees and costs are reasonable and

necessary in this case. In the event Hellmann challenges this fee request by submitting a response which necessitates additional briefing and/or discovery, Eagle would request that the Court grant Eagle leave to submit an additional fee application.

- 21. In forming my opinions herein, I have considered the type of litigation involved along with the parties and counsel involved, and have evaluated the following factors, among others: (1) the time and labor required; (2) the novelty and difficulty of the issues presented; (3) the skill required to perform the services properly; (4) the loss of other employment in taking the case; (5) the customary fee; (6) whether the fee is fixed or contingent; (7) the time limits imposed by the client or the circumstances; (8) the amount of money involved in the litigation and the result obtained; (9) the attorneys' experience, reputation, and abilities; (10) the undesirability of the case; (11) the nature and length of the attorneys' professional relationship with the client; and (12) fee awards in similar cases.
- 22. As set forth herein, I base my opinions on my education, training, and experience as a trial attorney practicing law in Dallas County, the Texas Disciplinary Rules of Professional Conduct, and the appropriate standards governing the recovery of attorneys' fees, and a review of the attorney's fee statements and accounting documents produced by PSSW in connection with this Motion. As set forth herein, my opinions are also based on my knowledge of this case as lead counsel for Eagle from pre-litigation stage through trial.
 - 23. I have also estimated conditional awards for cost of appeal:
 - a. For all post-trial motions, perfecting appeal, docketing, obtaining the record, motion practice in the Fifth Circuit, appellate briefs, oral argument in the Fifth Circuit, and any post-judgment briefs, estimated attorney's fees of \$75,000.
 - b. For any response to a petition for writ of certiorari before the United States Supreme Court, estimated attorney's fees of \$25,000.
 - c. For any briefs on the merits, oral argument, and post-argument briefing before the United States Supreme Court, estimated attorney's fees of \$75,000.

I arrived at these estimates by relying on my knowledge and experiences set forth herein and the opinions of my colleagues, Mr. Palter and Mr. Martinez. It is my opinion that these fees are an accurate estimate of the usual and customary attorneys' fees that would be incurred at each state of the appellate briefing in this case. It also my opinion that these fees would be reasonable and necessary to Eagle's case, if an appeal were to take place.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on April 24, 2013.

W. CRAIG STOKLEY

EXHIBIT A

HOME

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AREAS OF PRACTICE

ATTORNEYS IN THE NEWS CONTACT US

W. Craig Stokley, Esq.

FIRM PROFILE

Craig Stokley is a business litigation attorney who prides himself in bringing value to his clients and solving their hard problems. He has experience working on a wide variety of disputes. Craig's diverse trial practice includes complex commercial disputes and trials relating to contract claims, real estate transactions, Federal whistleblower actions, health care related disputes, business tort claims, employment matters, shareholder oppression and corporate membership disputes, trade secrets, intellectual property litigation, consumer debt defense, construction litigation, adversary proceedings in bankruptcy court, DTPA litigation, toxic tort litigation, white collar criminal defense, professional malpractice litigation, pro bono work, and fust about any business-relationship-gone-wrong situation.

Craig has achieved favorable results for his clients litigating in state and federal court, arbitration panels, and using administrative proceedings/remedies. Craig attributes his successes to working harder than the opposition, and taking a hands on get-to-know-the-clients'-business approach to representing his clients.

Before forming Palter Stokley Sims Wright PLLC, Craig began his legal practice with Baker Botts' trial section in Dallas, Texas. In 2009, Craig joined Riney Palter, a Dallas-based litigation boutique, where he handled a wide variety of cases ranging from multi-million dollar disputes to cases with just a few thousand dollars at issue. In 2010, 2011, and 2012, Craig was named a "Rising Star" by Texas Monthly / Law and Politics Magazine.

Before entering private practice, Craig served as a law clerk to the Honorable Chief Judge A. Joe Fish of the United States District Court for the Northern District of Texas, Dallas Division. In that capacity, Craig drafted opinions on motions for summary judgment, findings of fact, and conclusions of law from bench trials, motions to dismiss, motions to transfer, and other motions filed in federal court. He also worked closely with the federal sentencing guidelines and made recommendations to Judge Fish regarding appropriate sentences for convicted criminal defendants. While serving as law clark, Craig was responsible for advising Judge Fish on issues relating to the U.S.A. v. Holy Land Foundation for Relief and Development case. This additional responsibility required him to undergo a top-secret background clearance check from the Federal Bureau of Investigation

For the last three years, Craig has served as Court-Appointed Mediator for cases pending before Judge Fish. Craig has been successful in resolving most of the cases in which he has been appointed. As a mediator, Craig is committed to sticking with the a case even if the initial attempt at mediation is unsuccessful, and spending the extra time needed to understand the legal issues involved in the case before the parties sit down to mediate. In 2011, Judge Fish appointed Craig to mediate the U.S. Bank v. Verizon, et al. case which had in excess of \$9 billion in dispute.

While in law school, Croig served as a judicial intern to the Honorable David Hittner and the Honorable Sim Lake.

Prior to attending law school, Craig worked as a chemical engineer and contracts manager for Fluor Corporation, a large engineering, procurement, and construction company. In that capacity, he designed and tested combined-cycle power plants that were constructed all over the United States. He was also responsible for awarding and administering large subcontracts for construction of large combined-cycle power plants. These subcontracts included, among others: heavy lifting, electrical, control systems, water cooling systems, and construction of a heat recovery steam generator. Craig also assisted with a companywide organizational change initiative, during which he worked at the company's offices in Manila; Jakarta, Shanghai; Houston, Texas; Aliso Viegio, California; and Greenville, South Carolina.



Direct: (214) 888-3112 Mobile: (972) 951-8521 Fax: (214) 888-3109

Email: cstokley@palterlaw.com

Vcard: 2"

Judicial Clerkship:

Law Clerk to the Honorable Chief Judge A. Joe Fish, Northern District of Texas, Dallas Division (2005-2006)

Education:

J.D. (cum laude), Georgetown; University Law Center, 2005 B.S., chemical engineering, Texas Tech University, 1999

Admitted to Practice:

State Bar of Texas: U.S. Supreme Court; U.S. District Courts for the Northern. Southern, Eastern and Western Districts of Texas.

Professional Affiliations:

Dallas Bar Association Dallas Association of Young Lawyers Document 116 Filed 04/24/13 Page 24 of 178 PageID 2287

- SELECTED CLIENT KEPKESENIATIONS
- Secured a complete dismissal in an out-of-state patent infringement case.
- Obtained confidential settlement for client in a dispute related to a large real estate transaction.
- Obtained numerous dismissals in state court for consumer debt defense clients.
- Prevailed in probate court at trial phase on guardianship matters as well as complex guardianship and probate issues.
- Secured a favorable defense result for client who was accused of trademark infringement in federal court.
- Won multi-million dollar arbitration award for client in a dispute over a breach of contract.
- Successfully defended large accounting firm against claims for fraud and malpractice in state court.
- Obtained a favorable result for a regional bank in a patent infringement case before Judge Folsom in the United States District Court for the Eastern District of Texas. This representation included working with a large joint defense group to coordinate defenses for numerous national and regional banks.
- Successfully prosecuted shareholder oppression claims in Texas state court.
- Obtained a favorable result in an adversary proceeding in bankruptcy court for a large copper mining and smelting company who asserted a constructive fraudulent transfer claim arising from the sale of a large copper mining property.
- Represented client in a full jury trial before Judge Solis on breach of contract and trade secret misappropriation claim winning summary judgment before trial on the breach of contract claim.
- Defended a large telecommunications company in a patent infringement case before Judge Folsom in the United States District Court for the Eastern District of Texas. This representation successfully challenged the courts jurisdiction over the clients' parent company.

RECENT NEWS

2/9/2013 - Craig Stokley successfully facilitates settlement in contentious sexual harassment suit by former Dallas municipal court judge against City of Dallas....[read more...]

return to top of page

Preston Commons East, 8115 Preston Road, Suite 600, Dallas, TX 75225

Main Line: (214) 888-3110 Fax: (214) 888-3109

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Google+

EXHIBIT B



Riney Palter, PLLC 5949 Sherry Lane, Suite 1616 Dallas, Texas 75225-8009 214-461-1219 Accounting 214-461-1210 Fax

Tax ID # 20-4072167

VIA EMAIL

Everett Zeller
Email to: e.zeller@eaglesuspensions.com
Eagle Suspensions, Inc.
1605 Lakeway Dr.
Lewisville, TX 75057-6007

Date:

6/15/2011

Invoice No:

016820

Regarding: Eagle Suspensions, Inc. / Hellmann Worldwide Logistics, Inc., et al

EAGL01-01

Services Rendered

Services Re	endered				
Date	Staff	Description	Hours	Rate	Charges
5/31/2011	wcs	Confer with John Crow Miller regarding Eagle Suspension and possible opportunity with this client. Send correspondence in response to Everett Zeller.	0.00	\$250.00	No Charge
			0.50		No Charge
6/02/2011	wcs	Attention to initial matter set up. Send engagement letter. Review email correspondence and other documents relating to Hellmann's. Research issues with customs cases and appropriate strategy for client to obtain desired result at least cost. Confer with client regarding same.	0.80	\$250.00	\$200.00
		same.	2.00		No Charge
6/03/2011	BKP	Discussion with W. Craig Stokley concerning damages for goods seized at border.	0.40	\$375.00	\$150.00
6/03/2011	wcs	Draft and send summary of recommended next steps to client. Identify Laredo attorneys who litigate customs issues regularly.	1.20	\$250.00	\$300.00
6/07/2011	wcs	Confer with Everett regarding recommended next steps. Work to identify customs broker with proper knowledge to get shipment across the border.	1.00	\$250.00	\$250.00
6/10/2011 W	wcs	capable Mexican customs broker to locate the	1.40	\$250.00	\$350.00
		presses.	0.80		No Charge

	Riney, Palte Everett Zelle					6/15/2011 Page No.: 2
ŧ	6/14/2011	wcs	Confer with Baldamer Garcia and Adolpo Campero regarding customs broker. Obtain quote from Campero.	0.80	\$250.00	\$200.00
6	5/15/2011	wcs	Confer with client regarding customs broker, draft and send correspondence to Hellmann's regarding same.	1.00	\$250.00	\$250.00
			same.	0.80		No Charge
					Total Fees	\$1,700.00
	Total I	New Ch	arges			\$1,700.00
	Previo	ous Bala	nnce			\$0.00
	Balan	ce Due				\$1,700.00



Tax ID # 20-4072167

VIA EMAIL

Everett Zeller
Email to: e.zeller@eaglesuspensions.com
Eagle Suspensions, Inc.
1605 Lakeway Dr.
Lewisville, TX 75057-6007

Date:

7/14/2011

Invoice No:

017142

Regarding: Eagle Suspensions, Inc. / Hellmann Worldwide Logistics, Inc., et al

EAGL01-01

Services Rendered

Jeivices Ne	Selvices Kendered							
Date	Staff	Description	Hours	Rate	Charges			
6/17/2011	wcs	Attention to correspondence from David Kang.	0.20	\$250.00	\$50.00			
6/20/2011	wcs	Confer with counsel for Hellmann's, send update to client regarding same.	0.50	\$250.00	\$125.00			
6/21/2011	wcs	Review correspondence from David Kang and correspondence from Hellmann's counsel.	0.50	\$250.00	\$125.00			
6/22/2011	wcs	Attention to inquiry from Hellmann's counsel. Prepare authorization for opposing counsel, send same to client for execution.	0.80	\$250.00	\$200.00			
6/23/2011	wcs	Correspond with counsel for Hellmann's to obtain documentation requested from them.	0.50	\$250.00	\$125.00			
6/27/2011	wcs	Review documentation sent by Hellmann's. Forward same to our Mexican Customs broker. Send correspondence regarding analysis of documents to client.	0.80	\$250.00	\$200.00			
		documents to one in.	0.40		No Charge			
6/29/2011	wcs	Conference call with Mexican Customs broker regarding documentation and trip to Mexico set for Friday. Send power of attorney language to client for execution. Confer with client regarding same.	1.30	\$250.00	\$325.00			
		to execution. Comer with elient regarding dame.	0.50		No Charge			
6/30/2011	wcs	Review and forward power of attorney to Carlos Valerda with specific instructions for information gathering trip to Mexico.	0.50	\$250.00	\$125.00			

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Riney, Palte Everett Zelle					7/14/2011 Page No.: 2
7/07/2011	wcs	Brief attention to update from Adolfo.	0.20	\$250.00	\$50.00
7/11/2011	wcs	·	0.60	\$250.00	\$150.00
7/12/2011	wcs	- · ·	1.00	\$250.00	\$250.00
		Port Directors.	0.70		No Charge
				Total Fees	\$1,725.00
Total I	New Ch	arges			\$1,725.00
Previo	ous Bala	ance			\$1,700.00
Total I	Paymen	ats and Credits			\$-1,700.00
Balan	ce Due				\$1,725.00



Tax ID # 20-4072167

VIA EMAIL

Everett Zeller Email to: e.zeller@eaglesuspensions.com Eagle Suspensions, Inc. 1605 Lakeway Dr. Lewisville, TX 75057-6007

Date:

8/01/2011

Invoice No:

017349

Regarding: Eagle Suspensions, Inc. / Hellmann Worldwide Logistics, Inc., et al

EAGL01-01

Services Rendered

Date	Staff	Description	Hours	Rate	Charges
7/18/2011	WCS	Send correspondence to client regarding Mexican counsel's approach and filing with Mexican port director.	0.50	\$250.00	\$125.00
7/28/2011	wcs	Brief attention to inquiry from Mexican counsel.	0.30	\$250.00	\$75.00
				Total Fees	\$200.00
Total	New Ch	arges		-	\$200.00
Previo	ous Bala	nnce			\$1,725.00
Total	Paymer	ats and Credits		-	\$-1,725.00
Balan	ce Due			-	\$200.00



Tax ID # 20-4072167

VIA EMAIL

Everett Zeller
Email to: e.zeller@eaglesuspensions.com
Eagle Suspensions, Inc.
1605 Lakeway Dr.
Lewisville, TX 75057-6007

Date:

9/01/2011

Invoice No:

017546

Regarding: Eagle Suspensions, Inc. / Hellmann Worldwide Logistics, Inc., et al

EAGL01-01

Services Rendered

Services R	endered	d			
Date	Staff	Description	Hours	Rate	Charges
8/29/2011	wcs	Send short update to client.	0.20	\$250.00	\$50.00
8/31/2011	wcs	Correspond with Mexican counsel regarding case update.	0.30	\$250.00	\$75.00
				Total Fees	\$125.00
Total	New Ch	arges		-	\$125.00
Previo	ous Bala	ince			\$200.00
Total	Paymen	ats and Credits		_	\$-200.00
Balan	ce Due			_	\$125.00



Tax ID # 20-4072167

VIA EMAIL

Everett Zeller
Email to: e.zeller@eaglesuspensions.com
Eagle Suspensions, Inc.
1605 Lakeway Dr.
Lewisville, TX 75057-6007

Total Payments and Credits

Balance Due

Date:

10/01/2011

Invoice No:

017715

Regarding: Eagle Suspensions, Inc. / Hellmann Worldwide Logistics, Inc., et al		EAGL01-01			
Services R	endered	1			
Date	Staff	Description	Hours	Rate	Charges
9/12/2011	WCS	Detailed analysis regarding Texas law for and Uniform Commercial Code.	2.50	\$250.00	\$625.00
9/13/2011	wcs	Briefly confer with client regarding case evaluation.	0.30	\$250.00	\$75.00
9/14/2011	wcs	Attention to case evaluation memorandum related to Texas law on	0.50	\$250.00	\$125.00
9/19/2011	wcs	Finalize research for case evaluation memo. Send memo to client. Confer with client regarding same.	5.00	\$250.00	\$1,250.00
				Total Fees	\$2,075.00
Total	New Ch	arges		_	\$2,075.00
Previous Balance			\$125.00		

\$-125.00

\$2,075.00



Tax ID # 20-4072167

VIA EMAIL

Everett Zeller
Email to: e.zeller@eaglesuspensions.com
Eagle Suspensions, Inc.
1605 Lakeway Dr.
Lewisville, TX 75057-6007

Date:

11/15/2011

Invoice No:

018138

Regarding: Eagle Suspensions, Inc. / Hellmann Worldwide Logistics, Inc., et al

EAGL01-01

Services Rendered

Date	Staff	Description	Hours	Rate	Charges
10/03/2011	MXS	Review Craig Stokley's memorandum to client to become familiar with facts of the case. Research	0.50	\$175.00	\$87.50
			1.00		No Charge
10/03/2011	wcs	Attention Rule 202 Petition.	1.40	\$250.00	\$350.00
10/04/2011	MXS	Research	0.00	\$175.00	No Charge
		Additionally, research caselaw on			
		Discussed			
		with Craig Stokley the findings of my research.			
		with craig craine, and interned crain, recession	4.00		No Charge
10/05/2011	MXS	Research	1.50	\$175.00	\$262.50
		A delition of the second of			
		Additionally, research			
,			1.50		No Charge
10/06/2011	MXS	Additional research on the issues of	1.50	\$175.00	\$262.50
		and whether			

Riney, Palter PLLC Everett Zeller 11/15/2011 Page No.: 2

		Furthermore, draft memo to Craig Stokley .			
			1.50		No Charge
10/07/2011	MXS	Complete memo to Craig Stokley on	1.00	\$175.00	\$175.00
			1.00		No Charge
10/12/2011	MXS	Preparation of draft of Rule 202 Petition to Take	0.50	\$175.00	\$87.50
		Deposition Before Suit.	1.50		No Charge
10/12/2011	SGY	Research company background for Eagle Suspension and Hellmann Worldwide on Texas Secretary of State.	0.30	\$175.00	\$52.50
10/13/2011	MXS	• •	0.00	\$175.00	No Charge
		to Take Deposition Before Suit.	1.00		No Charge
10/14/2011	MXS	Completion of preparation of draft of Rule 202	1.00	\$175.00	\$175.00
		Petition to take Deposition before suit.	1.00		No Charge
10/14/2011	wcs	Attention to draft of 202 Petition. Coordination of client files in preparation for filing Rule 202 petition.	1.00	\$250.00	\$250.00
10/17/2011 MXS	202 Petition. Revise draft of Petitioner's Rule 202	0.10	\$175.00	\$17.50	
		Petition.	2.50		No Charge
10/17/2011	wcs	Revise and edit Rule 202 Petition. Detailed analysis regarding Email client regarding state of incorporation and principal office.	2.80	\$250.00	\$700.00
11/11/2011	wcs	Finalize Rule 202 petition and send to client for execution.	0.50	\$250.00	\$125.00
				Total Fees	\$2,545.00
Expenses					
Start Date	•	Description		Quantity	Charges
10/12/2011		Secretary of State Search Fee		2.00	\$2.00
11/02/2011		Secretary of State Search Fee		2.00	\$2.00

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Riney,	Palter	PLLC
Everet	t Zellei	•

11/15/2011 Page No.: 3

	Total Expenses	\$4.00
Total New Charges	-	\$2,549.00
Previous Balance		\$2,075.00
Total Payments and Credits	-	\$-2,075.00
Balance Due	- -	\$2,549.00



Tax ID # 20-4072167

VIA EMAIL

Everett Zeller Email to: e.zeller@eaglesuspensions.com Eagle Suspensions, Inc. 1605 Lakeway Dr. Lewisville, TX 75057-6007

Date:

12/01/2011

Invoice No:

018277

Regarding: Eagle Suspensions, Inc. / Hellmann Worldwide Logistics, Inc., et al

EAGL01-01

Services Rendered					
Date	Staff	Description	Hours	Rate	Charges
11/17/2011	WCS		2.50	\$250.00	\$625.00
11/30/2011	wcs	Attention to service and setting hearing on petition for deposition.	1.20	\$250.00	\$300.00
				Total Fees	\$925.00
Expenses					
Start Date		Description		Quantity	Charges
11/17/2011	-	EAGL01-01 Filing fee for Petition and Citation	,	1.00	\$257.00
1				Total Expenses	\$257.00
Total	New Ch	arges		-	\$1,182.00
Previo	ous Bala	ance			\$2,549.00
Balan	ce Due			_	\$3,731.00



Tax ID # 20-4072167

VIA EMAIL

Everett Zeller Email to: e.zeller@eaglesuspensions.com Eagle Suspensions, Inc. 1605 Lakeway Dr. Lewisville, TX 75057-6007

Date:

12/15/2011

Invoice No:

018464

Regarding: Eagle Suspensions, Inc. / Hellmann Worldwide Logistics, Inc., et al

EAGL01-01

Services Re	Services Rendered				
Date	Staff	Description	Hours	Rate	Charges
12/02/2011	WCS	Attention to service of process issues.	0.50	\$250.00	\$125.00
12/05/2011	wcs	Attention to registered agent information for Hellmann.	0.80	\$250.00	\$200.00
12/08/2011	wcs	Receive call from opposing counsel Tom Nork informing me that the insurance carrier had picked up the claim and that he would work with me to arrange for a corporate representative deposition. Send client update.	0.70	\$250.00	\$175.00
12/15/2011	MXS	Preparation of Agreed Order for Rule 202 Deposition.	1.10	\$175.00	\$192.50
12/15/2011	wcs	Revise and edit agreed order for corporate representative deposition. Correspond with opposing counsel regarding agreed order for corporate representative deposition. Propose John Russell, nonemployee, as their corporate representative and research	2.00	\$250.00	\$500.00
				Total Fees	\$1 192 50

Total Fees

\$1,192.50

Expenses

Start Date	Description	Quantity	Charges
12/05/2011	Secretary of State Search Fee	2.00	\$2.00
12/07/2011	Special Delivery Invoice #381789 Order #334-0243 Delivery	1.00	\$10.94

,	Riney, Paiter PLLC Everett Zeller			12/15/2011 Page No.: 2
		from RP to Special Delivery Process Dept		
	12/14/2011	EAGL01-01 Special Delivery Invoice #382331 Order#334- 0356 Process Serving Hellman Worldwide	1.00	\$165.00
			Total Expenses	\$177.94
	Total New Cha	rges		\$1,370.44
	Previous Balar	nce		\$3,731.00
	Total Payment	s and Credits		\$-6,280.00
	Balance Due			\$-1,178.56



Tax ID # 20-4072167

VIA EMAIL

Everett Zeller
Email to: e.zeller@eaglesuspensions.com
Eagle Suspensions, Inc.
1605 Lakeway Dr.
Lewisville TX 75057-6007

Date: 12

12/30/2011

Invoice No:

018640

Lewisville, T	X 7505	7-6007			
Regarding:	Eagle S	Suspensions, Inc. / Hellmann Worldwide Logistics, Inc., e	et al	E/	AGL01-01
Services R	endered	i			
Date	Staff	Description	Hours	Rate	Charges
12/17/2011	wcs	Attention to correspondence from opposing counsel regarding Hellmann 202 deposition.	1.00	\$250.00	\$250.00
12/21/2011	wcs	Draft agreed order consistent with opposing counsel's desire to designate a non-employee as corporate representative. Send correspondence to opposing counsel regarding same.	1.00	\$250.00	\$250.00
_				Total Fees	\$500.00
Expenses					
<u>Start Date</u> 12/22/2011	-	Description Special Delivery Invoice #382889 Order #334-0392 [from Special Delivery Process Dept to Houston Proc Office		Quantity 1.00	<u>Charges</u> \$49.00
				Total Expenses	\$49.00
Total	New Ch	arges		_	\$549.00
Previo	ous Bala	nce			\$-1,178.56
Total	Paymen	ts and Credits		-	\$629.56
Balan	ce Due			-	\$0.00

-Gase 3:12-cv-00611-G Document 116 Filed 04/24/13 Page 40 of 178 PageID 2303

Riney, Palter PLLC Everett Zeller

12/30/2011 Page No.: 2

 Previous Balance of IOLTA Account
 \$0.00

 12/29/2011 Deposit CK#6081 transfer overpayment to Iolta \$1,178.56
 \$1,178.56

 12/30/2011 Apply Funds to AR
 \$-549.00

 New Balance of IOLTA Account
 \$629.56



Tax ID # 20-4072167

VIA EMAIL

Everett Zeller Email to: e.zeller@eaglesuspensions.com Eagle Suspensions, Inc. 1605 Lakeway Dr. Lewisville, TX 75057-6007

Date:

1/15/2012

Invoice No:

018670

Regarding: Eagle Suspensions, Inc. / Hellmann Worldwide Logistics, Inc., et al

Services Rendered					
Date	Staff	Description	Hours	Rate	Charges
1/03/2012	wcs	Send detailed letter to opposing counsel explaining why a corporate representative deposition is appropriate. Research Send revised agreed	3.30	\$250.00	\$825.00
		order to take out any reference to John Russell. Review case law in NDTX regarding			
1/04/2012	WCS	Send client detailed update regarding status of case. Correspond with opposing counsel regarding 202 pre-suit deposition. Research Send correspondence to opposing counsel regarding same. Brief conference with opposing counsel.	2.50	\$250.00	\$625.00
		same. Dilei conterence with opposing counsel.			
1/05/2012	wcs	Send correspondence to opposing counsel regarding order for 202 deposition. Brief preparation for hearing.	1.20	\$250.00	\$300.00
1/06/2012	wcs	Prepare for and attend hearing to obtain order requiring Hellmann to present corporate representative witness. Send client update regarding hearing. Send opposing counsel correspondence regarding date for deposition.	4.20	\$250.00	\$1,050.00
1/10/2012	wcs	Attention to deposition of corporate representative and issues that may come up.	1.80	\$250.00	\$450.00

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Riney, Palter PLLC Everett Zeller			1/15/2012 Page No.: 2
		Total Fees	\$3,250.00
Expenses			
Start Date	Description	Quantity	Charges
1/06/2012	EAGL01-01 Travel Expense to Fort Worth for Hearing 75 miles & \$3.00 parking	1.00	\$44.63
		Total Expenses	\$44.63
Total New Cha	rges		\$3,294.63
Previous Balan	се		\$0.00
Total Payments	s and Credits		\$-629.56
Balance Due			\$2,665.07
Previous Balan	ice of IOLTA Account		\$629.56
	ply Funds to AR		\$-629.56

New Balance of IOLTA Account

\$0.00



Tax ID # 20-4072167

VIA EMAIL

Everett Zeller Email to: e.zeller@eaglesuspensions.com Eagle Suspensions, Inc. 1605 Lakeway Dr. Lewisville, TX 75057-6007

Date:

2/01/2012

Invoice No:

018791

Regarding: Eagle Suspensions, Inc. / Hellmann Worldwide Logistics, Inc., et al

Services Rendered					
Date	Staff	Description	Hours	Rate	Charges
1/18/2012	WCS	Correspondence with opposing counsel regarding logistics for 202 deposition and their request for an extension of time.	0.80	\$250.00	\$200.00
1/19/2012	TJR	Analysis concerning several issues concerning	0.40	\$375.00	\$150.00
1/19/2012	wcs	Send correspondence to Tom Nork regarding deficiencies in Wendi Borenstein's proposal for the Rule 202 deposition.	1.00	\$250.00	\$250.00
1/20/2012	wcs	Correspond with opposing counsel regarding Texas rules governing deposition of David Kang.	1.50	\$250.00	\$375.00
1/23/2012	wcs	Correspond with opposing counsel related to issues related to moving 202 deposition back. Convince opposing counsel that deposition on January 31 is appropriate. Review documents produced by opposing counsel and analyze whether the documents impact our case.	2.00	\$250.00	\$500.00
			1.00		No Charge
1/24/2012	AXG	Preparation of preliminary draft of Deposition Notice to the Corporate Representative of Hellman. Preparation of preliminary draft of correspondence enclosing same. Attention to docketing deposition date. Coordinate court reporter for the deposition.	0.90	\$125.00	\$112.50
1/24/2012	wcs	Brief attention to logistics for 202 deposition. Revise and edit deposition notice.	0.70	\$250.00	\$175.00

Riney, Palter Everett Zelle					2/01/2012 Page No.: 2
1/25/2012	wcs	Send correspondence to client regarding deposition of David Kang. Arrange for logistics regarding same. Review correspondence from opposing counsel regarding documents to be produced.	0.50	\$250.00	\$125.00
1/26/2012	wcs	Initial preparation for corporate representative deposition.	0.80	\$250.00	\$200.00
1/27/2012	wcs	Review production by Hellmann in preparation for deposition. Correspond with opposing counsel regarding deposition and production.	3.00	\$250.00	\$750.00
1/29/2012	JTP	Confer relating to proposed strategy for deposition.	0.30	\$375.00	\$112.50
1/29/2012	wcs	Prepare for Rule 202 deposition. Review and analyze documents produced by opposing counsel.	1.00	\$250.00	\$250.00
1/30/2012	MXS	Receipt and review of correspondence from Eagle relating to Preparation of response correspondence relating to	1.00	\$175.00	\$175.00
			1.70		No Charge
1/30/2012	wcs	Detailed preparation for Rule 202 corporate representative deposition. Review documentation and prepare deposition outline. Confer with Everett Zeller regarding follow up issues.	8.00	\$250.00	\$2,000.00
		Zelier regarding follow up issues.	1.50		No Charge
1/31/2012	BKP	Discussion with W. Craig Stokley regarding deposition questioning on issues.	0.30	\$375.00	\$112.50
1/31/2012	wcs	Conduct deposition of corporate representative of Hellmann Worldwide Logistics. Send summary of deposition to client. Begin drafting petition. Draft letter demanding additional documents and an inspection of the originals of certain documents.	6.00	\$250.00	\$1,500.00
_				Total Fees	\$6,987.50
Expenses		Description		Quantity	Charges
Start Date	-	Description Medic - Lunch (Deposition on 01/31/12)		Quantity 1 00	\$47.63

Meals - Lunch (Deposition on 01/31/12)

1/31/2012

P's A	ррх.	41
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\$47.63

\$47.63

1.00

Total Expenses

Case 3:12-cv-00611-G Document 116 Filed 04/24/13 Page 45 of 178 PageID 2308

Riney, Palter PLLC Everett Zeller	2/01/2012 Page No.: 3
Total New Charges	\$7,035.13
Previous Balance	\$2,665.07
Total Payments and Credits	\$-2,665.07
Balance Due	\$7,035.13



Tax ID # 20-4072167

VIA EMAIL

Everett Zeller
Email to: e.zeller@eaglesuspensions.com
Eagle Suspensions, Inc.
1605 Lakeway Dr.
Lewisville, TX 75057-6007

Date:

2/15/2012

Invoice No:

018947

Regarding: Eagle Suspensions, Inc. / Hellmann Worldwide Logistics, Inc., et al

Services R	endered	1			
Date	Staff	Description	Hours	Rate	Charges
2/06/2012	wcs	Conference with client and provide short update regarding deposition and next steps.	0.20	\$250.00	\$50.00
2/08/2012	AXG	Review case filings and prepare preliminary draft of Plaintiff's Complaint in the Northern District of Texas, Fort Worth Division. Retrieve Civil Cover Sheet from court website. Preparation of preliminary draft of Civil Cover Sheet.	1.40	\$125.00	\$175.00
2/08/2012	wcs	Send correspondence to opposing counsel regarding inspection. Begin drafting petition.	2.30	\$250.00	\$575.00
2/13/2012	AXG	Attention to exporting and indexing the deposition transcript and exhibits of David Kang to the file.	0.30	\$125.00	\$37.50
2/14/2012	wcs	Begin review of David Kang's deposition. Research	1.50	\$250.00	\$375.00
2/15/2012	wcs	Finalize audit response letter. Detailed review of David Kang deposition in preparation for filing petition.	3.50	\$250.00	\$875.00
				Total Fees	\$2,087.50
Expenses					
Start Date	_	Description		Quantity	Charges
1/27/2012		Federal Express # 793165195683		1.00	\$16.51

Riney, Palter PLLC Everett Zeller

2/15/2012 Page No.: 2

	Total Expenses	\$16.51
Total New Charges	-	\$2,104.01
Previous Balance		\$7,035.13
Total Payments and Credits	-	\$-7,035.13
Balance Due	-	\$2,104.01



Tax ID # 20-4072167

VIA EMAIL

Everett Zeller Email to: e.zeller@eaglesuspensions.com Eagle Suspensions, Inc. 1605 Lakeway Dr. Lewisville, TX 75057-6007

Date:

3/01/2012

Invoice No:

019054

Regarding: Eagle Suspensions, Inc. / Hellmann Worldwide Logistics, Inc., et al

Services Rendered						
Date	Staff	Description	Hours	Rate	Charges	
2/24/2012	wcs	Detailed research and drafting of Original Complaint. Circulate to client for review.	4.00	\$250.00	\$1,000.00	
2/25/2012	BKP	Revise complaint.	0.50	\$375.00	\$187.50	
2/27/2012	BKP	Complete review of draft complaint.	0.60	\$375.00	\$225.00	
2/27/2012	wcs	Revise and edit original complaint. Research Brief conference with client. Draft demand to Hellmann.	4.80	\$250.00	\$1,200.00	
2/28/2012	wcs	Finalize complaint and letter to opposing counsel. Meet with client regarding same.	4.80	\$250.00	\$1,200.00	
2/29/2012	AXG	Attention to opening case file with the Northern District of Texas and filing Complaint. Preparation of Summons and attention to electronically filing request for issuance of Summons. Attention to electronically filing Certificate of Interested Persons. Preparation of Judge's copy of electronically filed documents. Conference relating to request for service on Hellman.	0.90	\$125.00	\$112.50	
2/29/2012	wcs	File complaint in federal court. Send correspondence to opposing counsel. Confer regarding same.	2.80	\$250.00	\$700.00	
				Total Fees	\$4,625.00	

Case 3:12-cv-00611-G Document 116 Filed 04/24/13 Page 49 of 178 PageID 2312

Riney, Palter PLLC Everett Zeller

3/01/2012 Page No.: 2

Expenses

Start Date	Description	Quantity	Charges
2/15/2012	Federal Express	1.00	\$13.60
2/29/2012	Filing fees - Petition in Federal Court	1.00	\$350.00
		Total Expenses	\$363.60
Total New	Charges	_	\$4,988.60
Previous B	alance		\$2,104.01
Total Payn	nents and Credits	-	\$-2,104.01
Balance D	ue	_	\$4,988.60



Tax ID # 20-4072167

VIA EMAIL

Everett Zeller Email to: e.zeller@eaglesuspensions.com Eagle Suspensions, Inc. 1605 Lakeway Dr. Lewisville, TX 75057-6007

Date:

3/15/2012

Invoice No:

019180

Regarding: Eagle Suspensions, Inc. / Hellmann Worldwide Logistics, Inc., et al

Services Re	endered	1			
Date	Staff	Description	Hours	Rate	Charges
3/02/2012	WCS	Review and respond to correspondence from opposing counsel.	0.30	\$250.00	\$75.00
3/07/2012	AXG	Review online case docket and retrieve copy of issued Summons. Confer with private process server to request service of process on Hellman Worldwide Logistics, Inc. Prepare correspondence relating to request for service of process.	0.50	\$125.00	\$62.50
3/12/2012	wcs	Attention to service issues.	0.30	\$250.00	\$75.00
3/13/2012	AXG	Confer relating to status of service on Hellman. Confirm same with Craig Stokley. Attention to docketing deadline for Hellman to file Answer.	0.40	\$125.00	\$50.00
3/14/2012	wcs	Send update to client regarding case status.	0.30	\$250.00	\$75.00
3/15/2012	wcs	Review court reporter certification of deposition, and correspond with opposing counsel regarding case.	0.50	\$250.00	\$125.00
				Total Fees	\$462.50
Expenses					
Start Date		Description		Quantity	Charges
2/29/2012	-	Delivery Charges - Zip Delivery Invoice #18085-2092 from RP to Northern District of Texas on 02/29/12	2 Delivery	1.00	\$13.53
				 Fotal Expenses	\$13.53

Case 3:12-cv-00611-G Document 116 Filed 04/24/13 Page 51 of 178 PageID 2314

Riney, Palter PLLC Everett Zeller	3/15/2012 Page No.: 2
Total New Charges	\$476.03
Previous Balance	\$4,988.60
Total Payments and Credits	
Balance Due	\$476.03



Tax ID # 20-4072167

VIA EMAIL

Everett Zeller
Email to: e.zeller@eaglesuspensions.com
Eagle Suspensions, Inc.
1605 Lakeway Dr.
Lewisville, TX 75057-6007

Date:

4/01/2012

Invoice No:

019310

Regarding: Eagle Suspensions, Inc. / Hellmann Worldwide Logistics, Inc., et al EAGL01-01

Services Rendered

00.7.000					
Date	Staff	Description	Hours	Rate	Charges
3/20/2012	MXS	Conduct verdict search for the Judge assigned to this case.	0.50	\$175.00	\$87.50
3/22/2012	wcs	Review correspondence received from opposing counsel regarding their position in the case and settlement offer. Evaluate the merit of defendant's positions.	1.00	\$250.00	\$250.00
3/26/2012	AXG	Receipt and review of Affidavit of Service. Attention to electronically filing same.	0.40	\$125.00	\$50.00
3/27/2012	wcs	Analyze positions taken in defense counsel's email. Send update to client regarding case.	0.80	\$250.00	\$200.00
3/28/2012	wcs	Attention to Hellmann's response and reviewing David Kang deposition to identify inconsistencies in Hellmann's positions. Confer with client regarding Hellmann's positions.	1.20	\$250.00	\$300.00
3/30/2012	wcs	Analysis concerning extension requested by Hellmann. Send correspondence to opposing counsel regarding same.	0.50	\$250.00	\$125.00
	Subtotal				\$1,012.50 \$-87.50
Adjus	tments t	U FEES			Ψ-01.50

Expenses

\$925.00

Total Fees

Case 3:12-cv-00611-G Document 116 Filed 04/24/13 Page 53 of 178 PageID 2316

Riney, Palter PLLC Everett Zeller			4/01/2012 Page No.: 2
<u>Start Date</u> 3/29/2012	Description Process Service - Zip Delivery Inv.#18085-2120 Delivery on 03/12/12 from RP to Hellman Worldwide Logistics.	Quantity 1.00	<u>Charges</u> \$90.00
		Total Expenses	\$90.00
Total New Cha	irges		\$1,015.00
Previous Balar	nce		\$476.03
Total Payment	s and Credits		\$-476.03
Balance Due			\$1,015.00



Tax ID # 20-4072167

VIA EMAIL

Everett Zeller
Email to: e.zeller@eaglesuspensions.com
Eagle Suspensions, Inc.
1605 Lakeway Dr.
Lewisville, TX 75057-6007

Date:

4/15/2012

Invoice No:

019504

Regarding: Eagle Suspensions, Inc. / Hellmann Worldwide Logistics, Inc., et al

EAGL01-01

Services Rendered

Services R	endered	1			
Date	Staff	Description	Hours	Rate _	Charges
4/05/2012	wcs	Review Court Orders requiring Rule 26(f) conference, opposing counsel to obtain local counsel, and for opposing counsel to file a certificate of interested persons. Correspond with opposing counsel to set up time for Rule 26(f) conference and logistics for preparing joint status report.	1.50	\$250.00	\$375.00
4/09/2012	AXG	Receipt and review of Status Report Order. Attention to docketing deadlines contained in Order. Preparation of correspondence relating to same.	0.50	\$125.00	\$62.50
4/11/2012	wcs	Begin initial draft of joint status report.	1.00	\$250.00	\$250.00
4/12/2012	wcs	Draft first revision of Joint Status report. Circulate same to opposing counsel in preparation for Rule 26(f) conference per Court's order.	3.50	\$250.00	\$875.00
				Total Fees	\$1,562.50
Total New Charges				-	\$1,562.50
Previous Balance				\$1,015.00	
Total Payments and Credits				-	\$-1,015.00
Balan	ice Due			-	\$1,562.50

Riney, Palter PLLC Everett Zeiler 4/15/2012 Page No.: 2



Tax ID # 20-4072167

VIA EMAIL

Everett Zeller
Email to: e.zeller@eaglesuspensions.com
Eagle Suspensions, Inc.
1605 Lakeway Dr.
Lewisville, TX 75057-6007

Date:

5/01/2012

Invoice No:

019599

Regarding: Eagle Suspensions, Inc. / Hellmann Worldwide Logistics, Inc., et al EAGL01-01

Services Re	endered	i			
Date	Staff	Description	Hours	Rate	Charges
4/16/2012	WCS	Review comments from opposing counsel to joint status report. Attend court-ordered Rule 26(f) conference by telephone with opposing counsel. Detailed discussion regarding various positions in case. Finalize and file joint status report with Court.	2.50	\$250.00	\$625.00
4/17/2012	wcs	Review order establishing schedule and certain pretrial requirements. Begin developing discovery plan in light of Court's schedule and interest of taking a cost-effective approach.	1.50	\$250.00	\$375.00
4/25/2012	wcs	Review file and send update to client regarding recent events.	1.30	\$250.00	\$325.00
4/27/2012	wcs	Analysis of Hellmann's local counsel designation.	0.50	\$250.00	\$125.00
				Total Fees	\$1,450.00
Total New Charges				-	\$1,450.00
Previous Balance				\$1,562.50	
Total Payments and Credits				-	\$-1,562.50
Balan	ce Due			-	\$1,450.00



Tax ID # 20-4072167

VIA EMAIL

Everett Zeller Email to: e.zeller@eaglesuspensions.com Eagle Suspensions, Inc. 1605 Lakeway Dr. Lewisville, TX 75057-6007

5/15/2012 Date: Invoice No: 019705

Regarding: Eagle Suspensions, Inc. / Hellmann Worldwide Logistics, Inc., et al

Services Rendered					
Date	Staff	Description	Hours	Rate	Charges
5/09/2012	WCS	Research John McConnell and John Russell to identify how to secure testimony from them.	0.70	\$250.00	\$175.00
				Total Fees	\$175.00
Total I	New Ch	arges		-	\$175.00
Previo	ous Bala	unce			\$1,450.00
Total	Paymen	ats and Credits		-	\$-1,450.00
Balan	ce Due			-	\$175.00



Tax ID # 20-4072167

VIA EMAIL

Everett Zeller
Email to: e.zeller@eaglesuspensions.com
Eagle Suspensions, Inc.
1605 Lakeway Dr.
Lewisville, TX 75057-6007

Date:

7/01/2012

Invoice No:

020202

Regarding: Eagle Suspensions, Inc. / Hellmann Worldwide Logistics, Inc., et al

EAGL01-01

Services Rendered

Services Re	Services Rendered						
Date	Staff	Description	Hours	Rate	Charges		
6/05/2012	MXS	Conference with Craig Stokley relating to status of the case, discovery preparation and issue of whether Research Rule 202 Depositions and rules relating to the use of Rule 202 deposition in current lawsuit. Review Plaintiff's Petition for an order authorizing the taking of a Rule 202 deposition.	1.50	\$175.00	\$262.50		
6/06/2012	MXS	Review Plaintiff's Complaint, Defendant's Answer, Joint Status Report, Order Establishing Schedule and Certain Pretrial Requirements, and numerous correspondences by and between Plaintiff and Defendant's counsel. Review and prepare notes on Hellmann's corporate representative deposition transcript, and all supporting exhibits.	7.60	\$175.00	\$1,330.00		
6/07/2012	MXS	Review prepared notes from Hellmann's corporate representative deposition in preparation of drafting discovery requests to Hellmann. Preparation of Plaintiff's Request for Production and Request for Admissions to Hellmann.	4.00	\$175.00	\$700.00		
6/08/2012	MXS	Continue preparation of Eagle's Request for Production and Request for Admissions to Hellmann. Research Research case law relating to same. Preparation of correspondence to Craig Stokley outlining the laws and my analysis. Conference with Craig Stokley	5.70	\$175.00	\$997.50		

Riney, Palter PLLC Everett Zeller

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7/01/2012 Page No.: 2

	relating to strategies for obtaining depositions of third parties John Russell, John McConnell, and Ayala in Mexico. Research John Russell and John McConnell in order to obtain information for preparation of Subpoena to take their deposition. Preparation of Notice to take deposition of John Russell and John McConnell. Preparation of Subpoena to John Russell and John McConell for their deposition.			
6/08/2012 WCS	Detailed analysis concerning discovery plan and depositions of John Russell, John McConnell, Wendi Boresnstein, and Ayala. Consider need for requests for production and/or possibly requests for admission.	1.80	\$250.00	\$450.00
6/11/2012 MXS	Research the law surrounding Brief conference with Craig Stokley relating to same.	2.40	\$175.00	\$420.00
6/12/2012 AXG	Review of Scheduling Order. Attention to docketing deadlines. Preparation of correspondence relating to same.	1.20	\$125.00	\$150.00
Fee Subtotal				\$4,310.00
Adjustments	to Fees		-	\$-3,062.50
			Total Fees	\$1,247.50
Total New Cl	narges		-	\$1,247.50
Previous Bal	ance			\$175.00
Total Payme	nts and Credits		-	\$-175.00
Balance Due			-	\$1,247.50



Tax ID # 20-4072167

VIA EMAIL

Everett Zeller Email to: e.zeller@eaglesuspensions.com Eagle Suspensions, Inc. 1605 Lakeway Dr. Lewisville, TX 75057-6007

Date:

8/01/2012

Invoice No: 020403

Regarding: Eagle Suspensions, Inc. / Hellmann Worldwide Logistics, Inc., et al

Services R	endered	i			
Date	Staff	Description	Hours	Rate	Charges
7/19/2012	wcs	Confer with client regarding need for witness from Ayala. Send update regarding case.	0.80	\$250.00	\$200.00
7/27/2012	wcs	Correspond and confer with opposing counsel regarding deposition of John Russell.	0.50	\$250.00	\$125.00
7/30/2012	wcs	Send follow up correspondence to opposing counsel regarding John Russell deposition.	0.20	\$250.00	\$50.00
7/31/2012	wcs	Attention to Hellmann's notice of deposition for John Russell. Send correspondence to opposing counsel regarding deposition of John McConnell and Wendi Boresntein.	0.60	\$250.00	\$150.00
				Total Fees	\$525.00
Total New Charges					\$525.00
Previous Balance					\$1,247.50
Total Payments and Credits				-	\$-1,247.50
Balan	ice Due			-	\$525.00



Tax ID # 20-4072167

VIA EMAIL

Everett Zeller Email to: e.zeller@eaglesuspensions.com Eagle Suspensions, Inc.

1605 Lakeway Dr.

Lewisville, TX 75057-6007

Date:

8/15/2012

Invoice No:

020632

Regarding: Eagle Suspensions, Inc. / Hellmann Worldwide Logistics, Inc., et al

EAGL01-01

Services Rendered

Selvices M	Services Rendered							
Date	Staff	Description	Hours	Rate	Charges			
8/01/2012	MXS	Prepare Plaintiff's Initial Disclosures.	2.70	\$175.00	\$472.50			
8/01/2012	wcs	Attention to initial disclosures.	0.70	\$250.00	\$175.00			
8/02/2012	MXS	Edit Plaintiff's Rule 26 Initial Disclosures. Prepare John Russell deposition outline.	7.90	\$175.00	\$1,382.50			
8/02/2012	wcs	Brainstorm deposition examination topics for John Russell deposition.	1.20	\$250.00	\$300.00			
8/03/2012	MXS	Prepare John Russell's deposition outline.	7.50	\$175.00	\$1,312.50			
8/03/2012	WCS	Confer regarding deposition of John Russell. Initial preparation regarding same. Review and revise deposition outline and initial disclosures.	2.80	\$250.00	\$700.00			
8/06/2012	MXS	Attention to issues for John Russell deposition.	2.00	\$175.00	\$350.00			
8/07/2012	MXS	Continue preparation and revision of Plaintiff's Rule 26 Initial Disclosures, and prepare for filing with the clerk. Continue preparation for John Russell deposition.	2.10	\$175.00	\$367.50			
8/07/2012	wcs	Detailed preparation for deposition of John Russell. Organize exhibits, draft deposition outline, and study relevant documents.	5.80	\$250.00	\$1,450.00			
8/08/2012	wcs	Prepare for, attend, and take deposition of John Russell. Briefly confer with client regarding same and case strategy.	5.50	\$250.00	\$1,375.00			

Riney, Palter PLLC Everett Zeller				8/15/2012 Page No.: 2	
8/10/2012	wcs	Confer with opposing counsel regarding mediation dates and discovery issues. Review correspondence regarding same.	0.40	\$250.00	\$100.00
8/13/2012	wcs	Correspond with Tom Nork regarding mediation and Wendy Borenstein's deposition.	0.40	\$250.00	\$100.00
8/15/2012	wcs	Attention to inquiry from opposing counsel regarding mediation. Request deposition of Wendi Borsentien. Confer with client regarding same.	1.00	\$250.00	\$250.00
Fee Subtotal Adjustments to Fees				Takal Fana	\$8,335.00 \$-2,940.00
				Total Fees	\$5,395.00
Total New Charges			\$5,395.00		
Previo	ous Bala	ance			\$525.00
Total Payments and Credits				\$-525.00	

Balance Due

\$5,395.00



Tax ID # 20-4072167

VIA EMAIL

Everett Zeller
Email to: e.zeller@eaglesuspensions.com
Eagle Suspensions, Inc.
1605 Lakeway Dr.
Lewisville, TX 75057-6007

Date:

9/01/2012

Invoice No:

020708

Regarding: Eagle Suspensions, Inc. / Hellmann Worldwide Logistics, Inc., et al

EAGL01-01

Services Rendered

Services Rendered						
Date	Staff	Description	Hours	Rate	Charges	
8/16/2012	wcs	Correspond with opposing counsel regarding Wendy Borenstein deposition and mediation dates.	0.40	\$250.00	\$100.00	
8/21/2012	wcs	Confer with Tom Nork regarding mediation, depositions, and issues in case.	0.70	\$250.00	\$175.00	
8/22/2012	wcs	Confer with mediator's office regarding mediation. Analysis regarding strategic plan for summary judgment briefing.	1.00	\$250.00	\$250.00	
8/23/2012	wcs	Review John Russell deposition transcript.	0.70	\$250.00	\$175.00	
8/24/2012	AXG	Preparation of preliminary draft of Request for Production to Hellmann. Preparation of preliminary draft of First Set of Interrogatories to Hellmann.	1.50	\$125.00	\$187.50	
8/24/2012	wcs	Revise, edit, and serve requests for production of documents, interrogatories, requests for admissions, and deposition notice for Wendi Borenstein. Attention to logistics for mediation.	4.50	\$250.00	\$1,125.00	
8/27/2012	AXG	Preparation of preliminary draft of Motion for Summary Judgment and Brief in Support.	0.60	\$125.00	\$75.00	
8/27/2012	wcs	Draft summary judgment motion.	7.00	\$250.00	\$1,750.00	
8/28/2012	wcs	Draft summary judgment motion. Edit motion. Confer with Everett Zeller regarding need for affidavit and mediation.	5.50	\$250.00	\$1,375.00	

Riney, Palter PLLC

Everett Zeller

8/30/20)12 W(S Finish initial draft of summary judgment motion, affidavit of Everett Zeller, and appendix in support Revise and edit same. Briefly confer with client regarding damages facts. Research	7.00	\$250.00	\$1,750.00
8/31/20)12 AX	Preparation of Table of Authorities and Table of Contents for Brief in Support of Motion for Summary Judgment. Attention to revision of Brief in Support.	1.70	\$125.00	\$212.50
8/31/20)12 W	S Finalize summary judgment motion, brief in support, and appendix. Send finalized version to court. File same. Confer with client regarding affidavit and revise affidavit.	6.80	\$250.00	\$1,700.00
Fe	ee Subto	al			\$8,875.00
A	djustmer	is to Fees			\$-1,500.00
				Total Fees	\$7,375.00
Expens	ses				
Start Da		Description		Quantity	Charges
8/24/20	012	Court Reporter - Word for Word Inv. #3029 Dep John Russell	oosition of	1.00	\$216.40
				Total Expenses	\$216.40
Te	otal New	Charges			\$7,591.40
P	revious E	alance			\$5,395.00
Total Payments and Credits					\$-5,395.00
В	alance D	ue			\$7,591.40

9/01/2012

Page No.: 2



Tax ID # 20-4072167

VIA EMAIL

Everett Zeller Email to: e.zeller@eaglesuspensions.com Eagle Suspensions, Inc.

1605 Lakeway Dr. Lewisville, TX 75057-6007

10/01/2012 Date: 021044 Invoice No:

Regarding: Eagle Suspensions, Inc. / Hellmann Worldwide Logistics, Inc., et al

EAGL01-01

Carriage Bandarad

Services Rendered						
Date	Staff	Description	Hours	Rate	Charges	
9/04/2012	NLM	Attend meeting regarding Response to Motion for Summary Judgment.	0.50	\$225.00	\$112.50	
9/04/2012	wcs	Review and analyze Hellmann MSJ.	0.70	\$250.00	\$175.00	
9/05/2012	wcs	Draft letter to opposing counsel regarding Wendi Borenstein's deposition and proposed stipulations. Confer with opposing counsel regarding same. Analysis regarding opposing counsel's position.	1.60	\$250.00	\$400.00	
9/06/2012	wcs	Send correspondence to client regarding Hellmann's MSJ.	0.30	\$250.00	\$75.00	
9/07/2012	NLM	Review Original Complaint. Draft First Amended Complaint. Research exemplary damages for causes of action in Original Complaint. Draft Motion for Leave to Amend Complaint. Pursue strategy relating to same. Research local rules for filing. Prepare and coordinate filing for First Amended Complaint.	5.40	\$225.00	\$1,215.00	
9/07/2012	wcs	Review correspondence from opposing counsel. Confer regarding same. Correspond with client regarding summary judgment positions. Direction regarding amended pleading to add punitive damages.	1.10	\$250.00	\$275.00	
9/10/2012	NLM	Review and analyze Hellmann Motion for Summary Judgment. Review and analyze Eagle Motion for Summary Judgment. Review and analyze depositions and related discovery. Pursue strategy	4.20	\$225.00	\$945.00	

Riney, Paiter PLLC Everett Zeller				10/01/2012 Page No.: 2
	relating to Response to Hellmann Motion for Summary Judgment. Revise First Amended Complaint. Revise Motion for Leave to Amend Complaint to add exemplary damages. Meet and confer regarding filing of same.			
9/10/2012 WCS	Draft mediator's position statement and send to mediator. Review and file motion for leave to add exemplary damages to petition. Analysis regarding response to Hellmann's summary judgment motion.	4.00	\$250.00	\$1,000.00
9/11/2012 AXG	Coordinate court reporter coverage for the deposition of Wendy Borenstein.	0.20	\$150.00	\$30.00
9/11/2012 NLM	Review and analyze deposition of Hellmann witnesses. Review and analyze Hellmann's Motion for Summary Judgment. Draft outline for Response to Hellmann's Motion for Summary Judgment. Pursue strategy regarding same. Confer regarding deposition of W. Borenstein. Confer regarding mediation. Review mediation position statement. Meet and confer regarding Deposition of W. Borenstein. Review correspondence relating to same.	4.10	\$225.00	\$922.50
9/11/2012 WCS	Confer with opposing counsel regarding motion for leave. Analysis regarding same. Confer with mediator. Prepare for mediation. Attention to response to Hellmann's summary judgment motion.	3.80	\$250.00	\$950.00
9/12/2012 NLM	Meet and confer regarding deposition of W. Borenstein. Pursue strategy relating to same. Attend mediation. Confer regarding same. Pursue strategy regarding depositions. Confer regarding briefing schedule. Review and analyze deposition testimony for use in Response to Motion for Summary Judgment.	3.10	\$225.00	\$697.50
9/12/2012 WCS	Prepare for and attend mediation.	5.50	\$250.00	\$1,375.00
9/13/2012 NLM	Review and analyze evidence for Response to	6.20	\$225.00	\$1,395.00

Pursue strategy regarding discovery requests. Draft Second Request for Admissions to Defendant Hellmann. Revise and serve Second Request for Admissions to Hellmann. Draft and serve letter relating to same. Confer regarding same. Draft Response to Motion for Summary Judgment. Review evidence

Motion for Summary Judgment. Confer regarding

same. Conduct legal research regarding

Riney, Palter PLLC

Everett Zeiler

		relating to same.			
9/14/2012	NLM	Draft Response to Motion for Summary Judgment. Review evidence regarding same. Conduct legal research regarding same. Conduct legal research regarding	7.60	\$225.00	\$1,710.00
9/14/2012	wcs	Attention to email from opposing counsel. Attention to evidentiary issues.	0.30	\$250.00	\$75.00
9/15/2012	NLM	Revise Response to Motion for Summary Judgment. Review and analyze evidence regarding same.	5.30	\$225.00	\$1,192.50
9/17/2012	NLM	Revise Response to Motion for Summary Judgment	4.40	\$225.00	\$990.00
9/17/2012	NLM	Conduct legal research regarding	0.30	\$225.00	\$67.50
9/17/2012	wcs	Review and edit summary judgment response. Circulate same to Nathanial Martinez to incorporate into briefing.	4.00	\$250.00	\$1,000.00
9/18/2012	NLM	Revise Response to Motion for Summary Judgment.	1.40	\$225.00	\$315.00
9/19/2012	NLM	Revise Brief in Opposition to Motion for Summary Judgment. Confer with Craig Stokley regarding same. Conduct legal research regarding same.	6.60	\$225.00	\$1,485.00
9/19/2012	wcs	Review and edit summary judgment response.	0.70	\$250.00	\$175.00
9/20/2012	AXG	Review Brief in Opposition to Defendant's Motion for Summary Judgment. Preparation of preliminary draft of Table of Contents. Preparation of preliminary draft of Table of Authorities. Preliminary assimilation, redaction, and bates labeling of document attachments.	3.30	\$150.00	\$495.00
9/20/2012	NLM	Revise Brief in Opposition to Hellmann's Motion for Summary Judgment. Pursue exhibits and evidence regarding same. Conduct legal research regarding same. Draft Motion to Strike Evidence Offered By Hellmann in Support of its Motion for Summary Judgment. Draft Response portion of Brief in Opposition. Conduct legal research relating to Motion to Strike. Revise Appendix relating to Brief in Opposition.	12.00	\$225.00	\$2,700.00

10/01/2012

Page No.: 3

Riney, Paite Everett Zelld					10/01/2012 Page No.: 4
0/00/0040	WOO				
9/20/2012	WCS	Review summary judgment motion, provide edits. Review motion to strike, edit same. Review affidavit of Everett Zeller, edit same. Confer with client. Confer with Nathanial Martinez.	1.80	\$250.00	\$450.00
9/21/2012	AXG	Preparation of revisions to Brief in Opposition to Defendant's Motion for Summary Judgment. Update Table of Contents. Update revisions to Table of Authorities. Finalize document exhibits. Preparation of Appendix in Support of Brief in Opposition to Motion for Summary Judgment.	3.80	\$150.00	\$570.00
9/21/2012	NLM	Review and revise Response to Motion for Summary Judgment. Review and revise Appendix relating to same. Review and revise Brief in Support of Response to Motion for Summary Judgment. Review and revise Motion to Strike Evidence Offered In Support Of Motion for Summary Judgment. Pursue strategy relating to same. Prepare filings relating to same.	3.70	\$225.00	\$832.50
9/21/2012	wcs	Revise and edit response to Hellmann's summary judgment motion. Revise, edit, file motion to strike. Attention to Everett Zeller's affidavit. Review opposing counsel's response to our summary judgment motion. Send update to client.	3.00	\$250.00	\$750.00
9/24/2012	AXG	Analysis relating to End of Discovery deadline and deadline to propound discovery. Preparation of correspondence relating to same.	0.20	\$150.00	\$30.00
9/26/2012	wcs	Call opposing counsel regarding discovery responses. Review correspondence from opposing counsel regarding interrogatory responses.	0.50	\$250.00	\$125.00
9/29/2012	NLM	Review Hellmann's Response to Plaintiff's Motion for Summary Judgment. Draft Reply regarding same.	1.90	\$225.00	\$427.50
	ubtotal tments t	o Fees			\$22,957.50 \$-5,457.50
Aujus	unents	o rees		Total Fees	\$17,500.00
Expenses					
Start Date	_	Description		Quantity	Charges
9/04/2012		Delivery Charges - Special Delivery Inv. #403551 Orc -0143 Delivery from RP to Judge Fish on 09/04/12	der #248	1.00	\$21.42

Riney, Paiter PLLC Everett Zeiler			10/01/2012 Page No.: 5
9/24/2012	Delivery Charges - Eagle Express Inv.#RPX1-877 Delivery	1.00	\$13.12
	from RP to Federal Building on 09/24/12.		
9/27/2012	Delivery Charges - Eagle Express Inv.#RPX1-877 Delivery from RP to Federal Building on 09/27/12.	1.00	\$15.25
		Total Expenses	\$49.79
Total New Cha	rges		\$17,549.79
Previous Balan	се		\$7,591.40
Total Payments	and Credits		\$-7,591.40
Balance Due			\$17,549.79



Tax ID # 20-4072167

VIA EMAIL

Everett Zeller
Email to: e.zeller@eaglesuspensions.com
Eagle Suspensions, Inc.
1605 Lakeway Dr.
Lewisville, TX 75057-6007

Date: 10/15/2012

Invoice No: 021212

Regarding: Eagle Suspensions, Inc. / Hellmann Worldwide Logistics, Inc., et al

EAGL01-01

Services Rendered

Date	Staff	Description	Hours	Rate	Charges
10/01/2012	NLM	Confer with Craig Stokley regarding Motion for Summary Judgment. Draft Reply in Support of Motion for Summary Judgment. Conduct legal research regarding same.	1.90	\$225.00	\$427.50
10/02/2012	NLM	Draft Reply in Support of Motion for Summary Judgment. Confer with Craig Stokley regarding same. Conduct legal research regarding same.	12.40	\$225.00	\$2,790.00
10/03/2012	NLM	Revise Reply in Support of Motion for Summary Judgment. Confer with Craig Stokley regarding same.	1.50	\$225.00	\$337.50
10/03/2012	wcs	Review reply in support of summary judgment motion. Provide comments regarding same.	1.30	\$250.00	\$325.00
10/04/2012	NLM	Confer with Craig Stokley regarding Reply in Support of Motion for Summary Judgment. Revise Reply brief.	1.60	\$225.00	\$360.00
10/05/2012	AXG	Receipt and review of Deposition Notice to Dallas Spring. Attention to docketing of same.	0.20	\$150.00	\$30.00
10/05/2012	NLM	Revise Reply in Support of Motion for Summary Judgment. Prepare Reply brief for filing.	1.50	\$225.00	\$337.50
10/05/2012	wcs	Briefly correspond with client regarding case.	0.20	\$250.00	\$50.00
10/08/2012	NLM	Draft Reply to Response to Motion for Leave to Amend Complaint to add claim for exemplary	4.00	\$225.00	\$900.00

Riney, Palter PLLC

Everett Zeller

Lverett Zene	; ·				rage No 2
		damages. Conduct legal research relating to same.			
10/08/2012	wcs	Go over case status with client and discuss upcoming depositions and upcoming discovery responses.	1.50	\$250.00	\$375.00
10/09/2012	NLM	Revise Reply to Response for Motion to Leave to Amend Complaint. Confer with Craig Stokley regarding same.	0.90	\$225.00	\$202.50
10/09/2012	wcs	Edit and revise reply in support of motion for leave to amend.	2.00	\$250.00	\$500.00
10/10/2012	NLM	Review response to motion to strike summary judgment. Confer with Craig Stokley regarding deposition schedule. Draft subpoenas for depositions. Draft notice of intent to take deposition.	1.70	\$225.00	\$382.50
10/10/2012	wcs	Send correspondence regarding deposition schedule and upcoming depositions.	0.50	\$250.00	\$125.00
10/11/2012	NLM	Review client documents. Conduct interview of J. Martinez regarding shipment. Confer with Craig Stokley regarding deposition of J. Martinez and J. McConnell. Review emails re discovery deadline. Revise subpoenas.	3.00	\$225.00	\$675.00
10/11/2012	wcs	Confer with opposing counsel. Correspond with opposing counsel regarding same.	1.50	\$250.00	\$375.00
10/12/2012	NLM	Confer with Craig Stokley regarding request by Hellmann to continue trial. Confer with Craig Stokley regarding deposition strategy. Revise deposition notice.	0.80	\$225.00	\$180.00
10/12/2012	wcs	Send correspondence to opposing counsel. Confer with client and opposing counsel regarding deposition logistics and Defendants request for continuance. Review joint status report, and Defendants discovery requests.	3.20	\$250.00	\$800.00
10/15/2012	JTP	Confer relating to strategy for response to Motion for Continuance.	0.50	\$375.00	\$187.50
10/15/2012	NLM	Review Motion for Continuance. Draft Response to Motion for Continuance. Conduct legal research regarding same. Confer with Craig Stokley regarding same.	2.90	\$225.00	\$652.50

10/15/2012 Page No.: 2

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Riney, Palter PLLC Everett Zeller				10/15/2012 Page No.: 3
10/15/2012 WCS	Review motion for continuance filed by opposing counsel. Confer regarding same. Draft and edit response.	3.50	\$250.00	\$875.00
Fee Subtotal Adjustments t	o Fees			\$10,887.50 \$-2,887.50
			Total Fees	\$8,000.00
Total New Ch	arges			\$8,000.00
Previous Balance			\$17,549.79	
Total Paymen	ts and Credits			\$-17,549.79
Balance Due				\$8,000.00



Riney Palter, PLLC 5949 Sherry Lane, Suite 1616 Dallas, Texas 75225-8009 214-461-1219 Accounting 214-461-1210 Fax

Tax ID # 20-4072167

VIA EMAIL

Everett Zeller Email to: e.zeller@eaglesuspensions.com Eagle Suspensions, Inc. 1605 Lakeway Dr. Lewisville, TX 75057-6007

Date:

11/01/2012

Invoice No:

021377

Regarding: Eagle Suspensions, Inc. / Hellmann Worldwide Logistics, Inc., et al EAGL01-01

Services Rendered						
Date	Staff	Description	Hours	Rate	Charges	
10/16/2012	NLM	Revise response to motion for continuance and expedited consideration. Draft affidavit of W. Craig Stokley regarding same.	2.50	\$225.00	\$562.50	
10/16/2012	wcs	Finalize response to motion for continuance, affidavit in support, and file.	1.00	\$250.00	\$250.00	
10/17/2012	NLM	Conduct legal research regarding to motion for leave. Conduct legal research regarding new arguments in reply brief.	2.80	\$225.00	\$630.00	
10/17/2012	wcs	Confer with opposing counsel regarding their desire to file motion for leave to file reply brief. Review same.	0.40	\$250.00	\$100.00	
10/18/2012	NLM	Review Hellmann Reply brief. Confer with W. Craig Stokley regarding Motion for Continuance. Amend Eagle Responses to Requests for Disclosure. Draft Eagle Motion for Leave to File Surreply.	6.80	\$225.00	\$1,530.00	
10/18/2012	WCS	Analyze approach to responding to Defendants motion for leave to file reply and/or filing a sur-reply. Confer with client regarding case update, developments at the company, and logistics for completing discovery obligations in the coming weeks.	1.20	\$250.00	\$300.00	
10/19/2012	NLM	Draft Surreply brief in Opposition to Hellmann's Motion for Summary Judgment. Confer with W. Craig Stokley regarding same.	1.90	\$225.00	\$427.50	

Riney, Palter PLLC

Everett Zeller

10/22/2012	AXG	Preparation of correspondence to opposing counsel attaching deposition subpoenas. Attention to service of same. Attention to docketing depositions. Preparation of correspondence to local process server requesting service on John McConnell. Confirm court reporter coverage for the deposition of John McConnell. Preparation of correspondence to process server in Laredo relating to service on Jose Martinez. Confirm court reporter and videographer for same.	0.90	\$125.00	\$112.50
10/22/2012	NLM	Revise Subpoenas to John McConnell and Joe Martinez. Confer with W. Craig Stokley regarding same. Draft Response and Objections to Hellmann Requests for Admissions.	2.30	\$225.00	\$517.50
10/23/2012	NLM	Revise Responses to Requests for Admissions. Draft Answers and Objections to First Set of Interrogatories.	2.10	\$225.00	\$472.50
10/24/2012	AXG	Preparation of correspondence to George relating to status of service on Joe Martinez. Confer relating to status of service.	0.20	\$150.00	\$30.00
10/24/2012	NLM	Revise answers to interrogatories.	0.30	\$225.00	\$67.50
10/26/2012	AXG	Receipt and review of Return of Service relating to Subpoena to Joe Martinez. Confer relating to procedure associated with filing same.	0.30	\$150.00	\$45.00
10/26/2012	NLM	Revise Objection and Motion to Strike New Arguments in Reply Brief. Confer with W. Craig Stokley regarding same. Prepare brief for filing.	1.10	\$225.00	\$247.50
10/26/2012	wcs	Attention to motion to strike, confer regarding same.	1.30	\$250.00	\$325.00
10/29/2012	NLM	Review response to motion to strike new arguments in Hellmann reply brief. Confer with W. Craig Stokley regarding need to file reply brief regarding same.	0.20	\$225.00	\$45.00
10/29/2012	wcs	Meet with client regarding documents to be produced and other discovery. Prepare discovery responses. Review discovery responses sent by opposing counsel. Review response filed by opposing counsel to our motion to strike arguments raised by Defendants in their tardy summary judgment response.	5.00	\$250.00	\$1,250.00

11/01/2012

Page No.: 2

Riney, Palter P Everett Zeller	PLLC				11/01/2012 Page No.: 3
10/30/2012	AXG	Preparation of Responses and Objections to First Request for Production. Preparation of Answers and Objections to First Set of Interrogatories.	3.40	\$150.00	\$510.00
10/31/2012	NLM	Prepare Surreply in Opposition to Motion for Summary Judgment for filing. Research deadlines for serving responses under Federal Rules of Civil Procedure. Confer with W. Craig Stokley regarding discovery responses. Revise responses to requests for admission, requests for production, and interrogatories. Review client documents to be produced.	6.00	\$225.00	\$1,350.00
10/31/2012 \	wcs	Serve amended disclosures.	0.80	\$250.00	\$200.00
Fee Sub Adjustm		o Fees			\$8,972.50 \$-675.00
				Total Fees	\$8,297.50
Expenses					
Start Date		Description		Quantity	Charges
10/24/2012		Delivery - SD Process Department to John McConnell Inv.#407430		1.00	\$132.91
10/25/2012		Service Fee - Texas Pictorial Inv.#1373 Process Service on Joes Martinez		1.00	\$121.05
			٦	Total Expenses	\$253.96
Total Ne	ew Cha	arges			\$8,551.46
Previous	s Bala	nce			\$8,000.00
Total Pa	aymen	ts and Credits			\$-8,000.00
Balance	Due				\$8,551.46



Riney Palter, PLLC 5949 Sherry Lane, Suite 1616 Dallas, Texas 75225-8009 214-461-1219 Accounting 214-461-1210 Fax

Tax ID # 20-4072167

VIA EMAIL

Everett Zeller
Email to: e.zeller@eaglesuspensions.com
Eagle Suspensions, Inc.
1605 Lakeway Dr.
Lewisville, TX 75057-6007

Date:

11/15/2012

Invoice No:

021540

Regarding: Eagle Suspensions, Inc. / Hellmann Worldwide Logistics, Inc., et al

EAGL01-01

Services Rendered

Services Re	endered	1			
Date	Staff	Description	Hours	Rate	Charges
11/01/2012	NLM	Confer with W. Craig Stokley regarding outstanding discovery responses. Draft verification regarding interrogatory responses. Conduct legal research regarding discovery rules. Serve discovery responses.	3.20	\$225.00	\$720.00
11/01/2012	wcs	Detailed attention to responding to Defendants discovery requests. Multiple conferences with client regarding same.	5.50	\$250.00	\$1,375.00
11/02/2012	NLM	Revise certificate of service for discovery responses. Draft email to counsel regarding same. Confer with W. Craig Stokley regarding outstanding discovery.	0.90	\$225.00	\$202.50
11/03/2012	NLM	Revise Rule 26 disclosures. Draft motion for leave to file Rule 26 disclosures. Confer with W. Craig Stokley regarding same. Send email to counsel regarding same.	4.10	\$225.00	\$922.50
11/03/2012	wcs	Attention to pretrial disclosures.	0.50	\$250.00	\$125.00
11/05/2012	NLM	Revise pretrial disclosures for filing. File and serve pretrial disclosures.	0.30	\$225.00	\$67.50
11/06/2012	NLM	Review Amended Notice of Deposition for Dallas Spring and requests for documents relating to same. Draft response and objections to same. Conduct legal research regarding deadline to serve objections. Confer with W. Craig Stokley regarding same.	3.70	\$225.00	\$832.50

Riney, Palter PLLC	11/15/2012
Everett Zeller	Page No.: 2

11/06/2012	wcs	Travel to client location and meet with Shirley Robinson and Everett Zeller regarding deposition preparation. Prepare for same. Finalize production of Dallas Spring documents and responses to requests. Confer with opposing counsel regarding pre-trial face to face conference and logistics regarding same. Propose that we request a January 21 trial setting.	8.00	\$250.00	\$2,000.00
11/07/2012	NLM	Review revised notices of deposition of Dallas Spring. Confer with W. Craig Stokley regarding deposition of Shirley Robinson.	0.40	\$225.00	\$90.00
11/07/2012	wcs	Meet with Shirley Robinson and present her for deposition in corporate representative capacity for Dallas Spring and in her individual capacity. Multiple meetings regarding same.	5.50	\$250.00	\$1,375.00
11/08/2012	NLM	Draft objections and designations to Hellmann notice of deposition of Eagle corporate representative.	1.00	\$225.00	\$225.00
11/09/2012	NLM	Prepare for Deposition of Jose Martinez. Pursue exhibits regarding same.	0.40	\$225.00	\$90.00
11/09/2012	wcs	Correspond with opposing counsel regarding preferential trial setting on January 21, 2012.	0.40	\$250.00	\$100.00
11/12/2012	NLM	Deposition preparation. Pursue exhibits regarding same. Draft deposition outline.	3.70	\$225.00	\$832.50
11/12/2012	wcs	Confer with Everett Zeller regarding deposition preparation. Send Shirley Robinson's deposition to client for review in preparation for depositions.	0.70	\$250.00	\$175.00
11/13/2012	NLM	Deposition preparation. Review exhibits from previous depositions. Revise deposition outline. Revise and serve responses and objections to notice of deposition of Eagle Corporate Representative.	2.60	\$225.00	\$585.00
11/13/2012	wcs	Prepare for deposition of Everett Zeller. Meet with client regarding deposition. Draft, edit, and serve responses to Eagle corporate rep deposition notice.	5.50	\$250.00	\$1,375.00
11/14/2012	AXG	Confirm deposition setting and coverage with Susan Constantin.	0.10	\$150.00	\$15.00

Riney, Palter I Everett Zeller					11/15/2012 Page No.: 3
11/14/2012	NLM	Pursue exhibits for Deposition of Jose Martinez. Confer with Craig Stokley regarding same. Pursue strategy with Craig Stokley and Everett Zeller regarding case status and future action. Draft deposition outline.	4.00	\$225.00	\$900.00
11/14/2012	wcs	Defend Everett Zeller's deposition. Defend Corporate Representative of Dallas Spring's deposition. Defend Corporate Representative of Eagle Suspensions deposition. Multiple meetings regarding same. Prepare for John McConnell's deposition.	10.00	\$250.00	\$2,500.00
11/15/2012	NLM	Confer with Craig Stokley regarding deposition of John McConnell. Pursue strategy with Craig Stokley regarding deposition of Jose Martinez. Prepare exhibits for deposition of Jose Martinez. Revise deposition outline regarding same.	8.00	\$225.00	\$1,800.00
11/15/2012	wcs	Prepare for and take deposition of John McConnell. Confer regarding same in preparation for Joe Martinez's deposition.	4.00	\$250.00	\$1,000.00
Fee Su Adjustn		o Fees			\$17,307.50 \$-2,075.00
				Total Fees	\$15,232.50
Expenses					
Start Date		Description		Quantity	Charges
10/30/2012		EAGL01-01 Travel expenses on 10/30		1.00	\$26.65
11/06/2012		EAGL01-01 Travel expenses on 11/06		1.00	\$26.65
11/14/2012		Court Reporter - U.S. Legal Support Inv.#91369285 Depositions of Shirley Robinson		1.00	\$503.21
			Te	otal Expenses	\$556.51
Total N	lew Cha	arges			\$15,789.01
Previou	ıs Bala	nce			\$8,551.46
Total P	aymen	ts and Credits			\$-8,551.46

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Riney, Palter PLLC Everett Zeller 11/15/2012 Page No.: 4

Balance Due

\$15,789.01



Riney Palter, PLLC 5949 Sherry Lane, Suite 1616 Dallas, Texas 75225-8009 214-461-1219 Accounting 214-461-1210 Fax

Tax ID # 20-4072167

VIA EMAIL

Everett Zeller
Email to: e.zeller@eaglesuspensions.com
Eagle Suspensions, Inc.
1605 Lakeway Dr.
Lewisville, TX 75057-6007

Date: 12

12/15/2012

Invoice No:

021883

Regarding: Eagle Suspensions, Inc. / Hellmann Worldwide Logistics, Inc., et al

EAGL01-01

Services Rendered

Services Rendered						
Date	Staff	Description	Hours	Rate	Charges	
11/16/2012	NLM	Prepare for deposition of Joe Martinez. Take deposition of Joe Martinez. Confer with W. Craig Stokley regarding same. Draft email regarding discovery deadlines.	7.00	\$225.00	\$1,575.00	
11/16/2012	wcs	Correspond with opposing counsel regarding preferential rial setting.	0.00	\$250.00	No Charge	
		, and the same of	0.20		No Charge	
11/21/2012	AXG	Receipt and review of transcript of the deposition of John McConnell. Attention to indexing same to the file.	0.20	\$150.00	\$30.00	
11/27/2012	wcs	Correspond with opposing counsel regarding letter for preferential trial setting. Confer with Court regarding same.	0.00	\$250.00	No Charge	
		regulating sume.	0.70		No Charge	
12/05/2012	wcs	S Draft and hand deliver letter to Court. Circulate same to opposing counsel.	0.00	\$250.00	No Charge	
			1.50		No Charge	
12/07/2012	wcs	Respond to inquiry by Court.	0.00 0.50	\$250.00	No Charge No Charge	
				Total Fees	\$1,605.00	
Expenses						
Start Date		Description	 	Quantity	Charges	

Riney, Palter PLLC Everett Zeller			12/15/2012 Page No.: 2
11/14/2012	Court Reporter - U.S. Legal Support Inv.#91369988 Deposition of Everett Zeller, Everett Zeller-Eagle Suspension & Everett Zeller-Dallas Spring	1.00	\$747.65
11/15/2012	Court Reporter - Constantin & Associates Inv.#3744 Deposition of John McConnell	1.00	\$640.30
11/16/2012	Texas Pictorial - Conference Room Rental on 11/16/12 Laredo, TX	1.00	\$150.00
11/20/2012	Travel Expense to Laredo, TX for John McConnell Deposition Airfare \$489.60, Hotel \$198.36, Internet \$10.77, Meals \$24.76	1.00	\$723.49
12/10/2012	Court Reporter - Alfonso DeLeon - Deposition of Jose Martinez on 11/16/12	1.00	\$1,294.00
		Total Expenses	\$3,555.44
Total New Cha	arges		\$5,160.44
Previous Balar	nce		\$15,789.01
Total Payment	s and Credits		\$-15,789.01
Balance Due			\$5,160.44



Riney Palter, PLLC 5949 Sherry Lane, Suite 1616 Dallas, Texas 75225-8009 214-461-1219 Accounting 214-461-1210 Fax

Tax ID # 20-4072167

VIA EMAIL

Everett Zeller
Email to: e.zeller@eaglesuspensions.com
Eagle Suspensions, Inc.
1605 Lakeway Dr.
Lewisville, TX 75057-6007

Date:

1/01/2013

Invoice No:

021991

Regarding: Eagle Suspensions, Inc. / Hellmann Worldwide Logistics, Inc., et al

EAGL01-01

Services Rendered

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Date	Staff	Description	Hours	Rate	Charges
12/20/2012	NLM	Confer with Craig Stokley regarding summary judgment order. Confer regarding settlement strategy.	0.00	\$225.00	No Charge
			0.50		No Charge
12/21/2012	NLM	Confer with W. Craig Stokley regarding case status and future action. Confer with W. Craig Stokley regarding email from mediator.	0.00	\$225.00	No Charge
			0.20		No Charge
				Total Fees	\$0.00
Previo	us Bala	ance			\$5,160.44
Baland	ce Due			•	\$5,160.44



2712 Amherst Street, Dallas, TX 75225 972-653-0196 (Phone) / 214-722-1077 (Fax) TAX ID # 46-1734174

VIA EMAIL: e.zeller@eaglesuspensions.com

Everett Zeller
Eagle Suspensions, Inc.
1605 Lakeway Drive

1605 Lakeway Drive Invoice Number: 00005 Lewisville, TX 75057-6007 File Number: EAGL01-01

Regarding: Eagle Suspensions, Inc. / Hellmann Worldwide Logistics

Pro	fessional	Services	rendered:
110	i codivitat	SEI VILES	i chuci cu.

Date 01/04/13	Staff WCS	<u>Description</u> Attention to mediation logistics and trial strategy. Confer	Hours 3.20	<u>Rate</u> \$250.00	<u>Charges</u> \$800.00
		with opposing counsel regarding case and options for structuring settlement discussions as well as some pre-trial issues. Multiple correspondence regarding same. Confer with client regarding			
01/05/13	WCS	Brainstorm witness list and trial strategy.	1.90	\$250.00	\$475.00
01/06/13	WCS	Attention to trial strategy. Preparation of checklist of items to be completed for trial. Prepare Notice of New Firm.	3.40	\$250.00	\$850.00
01/07/13	WCS	Confer with Nathanial Martinez regarding matters to be completed for Eagle trial preparation. Prepare materials for trial notebooks. Consider strategy regarding Brainstorm jury selection issues and cross examination of David Kang.	3.40	\$250.00	\$850.00
01/08/13	WCS	Review draft jury instructions. Send comments to Nathanial regarding same and inquiry regarding	2.80	\$250.00	\$700.00
01/08/13	NLM	Conduct legal research regarding Confer with W. Craig Stokley regarding trial preparation and materials.	2.00	\$225.00	\$450.00

Date: 01/15/2013

Cas	se 3:12-cv-	00611-G Document 116 Filed 04/24/13 Page 84 of	178 P	ageID 234	.7
Page 2 01/15/13 I	nvoice			E	AGL01-01
01/09/13	wcs	Meet with Nathanial Martinez regarding trial prep outstanding items. Meet with Nathanial Martinez and Alex Gamino regarding trial preparation notebooks and trial preparation of outstanding items. Brainstorm trial subpoenas and other trial issues. Discuss proof outline and approach to accomplishing completion.	4.80	\$250.00	\$1,200.00
01/09/13	NLM	Meet and confer with W. Craig Stokley regarding trial preparation, strategy, and materials. Draft trial material checklist. Conduct legal research regarding jury charge and instructions for claims and defenses. Draft jury charge and instructions. Confer with W. Craig Stokley regarding same.	7.00	\$225.00	\$1,575.00
01/09/13	AXG	Meeting to discuss strategy for trial. Review of case document Begin preliminary assimilation of documents for pretrial and trial. Review case docket sheet to confirm live pleadings for trial and pleadings notebook.	2.50	\$150.00	\$375.00
01/10/13	WCS	Attention to proof outline issues, trial notebooks, and mediation. Send follow up to opposing counsel regarding mediation. Review deadlines with Court for January 25, 2013. Consider strategic options for trial presentation of liability, damages, and attorney fees.	3.20	\$250.00	\$800.00
01/10/13	NLM	Confer with W. Craig Stokley regarding trial notebooks. Confer with outside vendor regarding printing of same. Conduct legal research regarding	2.00	\$225.00	\$450.00

01/10/13	AXG	Continued assimilation and extraction of documents and electronic files for trial and pretrial. Preparation of preliminary draft of Witness List. Preparation of preliminary draft of Exhibit List.	1.90	\$150.00	\$285.00
01/11/13	WCS	Confer with Jeff Abrams regarding mediation. Attention to court order regarding punitive damages. Attention to strategy regarding Confer with Nathanial Martinez regarding same. Attention to logistics for trial notebooks.	2.00	\$250.00	\$500.00
01/11/13	NLM	Review materials and exhibits for trial preparation notebooks. Confer with W. Craig Stokley regarding same. Review deposition of John Russell for trial preparation. Draft outline for proof and evidence at trial. Pursue trial strategy. Revise and circulate first amended complaint.	4.00	\$225.00	\$900.00
01/12/13	WCS	Attention to trial presentation of liability, damages, and attorney fees. Attention to amended petition with punitive damages and certain issues for filing.	1.50	\$250.00	\$375.00
			P's A	ррх. 81	

Page 3 01/15/13 Invoice

EAGL01-01

01/12/13	NLM	Draft trial preparation proof and evidence outline. Review deposition testimony in preparation for trial. Draft questions for cross examination at trial.	2.50	\$225.00	\$562.50
01/13/13	WCS	Attention to amended petition. Review summary judgment motions in preparation for trial.	1.00	\$250.00	\$250.00
01/14/13	wcs	Confer with Nathanial Martinez regarding trial subpoenas, jury selection issues, trial proof outline, witness strategy. Prepare and send audit response letter. Develop strategy for trial notebooks. Review deposition testimony of John McConnell for cross examination testimony.	5.30	\$250.00	\$1,250.00
01/14/13	NLM	Revise John Russell and John McConnell deposition testimony for trial preparation. Draft cross-examination questions relating to same. Draft outline of proof and evidence relating to same. Confer with Craig Stokley regarding trial preparation and strategy Revise and file First Amended Complaint. Confer regarding delivery of same to court.	6.90 y.	\$225.00	\$1,553.50
01/15/13	WCS	Prepare for trial. Confer with Nathanial Martinez regarding trial strategy, themes, and jury selection. Review exhibits for trial.	3.50	\$250.00	\$875.00
01/15/13	NLM	Review deposition testimony in preparation for trial. Draft outline and examination questions relating to same. Confer with W. Craig Stokley regarding same. Review trial materials and pursue exhibits for trial.	3.40	\$225.00	\$765.00

Balance Due: \$15,841.00

\$15,841.00

Total Fees:



2712 Amherst Avenue, Dallas, TX 75225 972-653-0196 (Phone) / 214-722-1077 (Fax) TAX ID # 46-1734174

VIA EMAIL: e.zeller@eaglesuspensions.com

Everett Zeller
Eagle Suspensions, Inc.
1605 Lakeway Drive
Lewisville, TX 75057-6007

Date: 02/01/2013 Invoice Number: 00028 File Number: EAGL01-01

Regarding: Eagle Suspensions, Inc. / Hellmann Worldwide Logistics

Professional services rendered:

<u>Date</u> 01/16/13	Staff NLM	<u>Description</u> Review proposed trial exhibits. Confer with W. Craig Stokley regarding same.	Hours .50	<u>Rate</u> \$225.00	<u>Charges</u> \$112.50
01/17/13	AG	Retrieve copy of Scheduling Order for attorney review. Assimilation of discovery responses for trial use.	.80	\$150.00	\$120.00
01/17/13	NLM	Conduct legal research regarding Review exhibits for trial. Draft subpoenas for trial witnesses. Confer with W. Craig Stokley regarding same.	3.20	\$225.00	\$720.00
01/18/13	AG	Preparation of comparison merge of Hellmann Answers. Retrieve live pleadings from PACER for trial notebooks. Begin assimilation of pleadings and preparation of Pleadings Notebook for Trial.	4.00	\$150.00	\$600.00
01/18/13	WCS	Review stipulation. Attention to how defendants stipulation impacts trial and pretrial submissions.	2.00	\$250.00	\$500.00
01/18/13	NLM	Conduct legal research for trial briefs and motions in limine regarding evidence at trial. Conduct research regarding Conduct legal research regarding Confer with W. Craig Stokley regarding same. Draft trial subpoenas.	4.30	\$225.00	\$967.50

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01/19/13	NLM	Conduct legal research regarding Confer with John T. Palter regarding same. Draft to-do list for Eagle trial preparation. Draft email to Craig W. Stokley regarding outstanding assignment for trial preparation.	2.60	\$225.00	\$585.00
01/19/13	WCS	Review to do list. Evaluate issues for trial brief, motions in limini, and pretrial order.	2.70	\$250.00	\$675.00
01/20/13	WCS	Organize issues for trial brief. Evaluate methods to obtain attorney fees bifurcated. Consider whether to produce fee statements and include them as exhibits. Consider whether to produce fee statements.	1.50	\$250.00	\$375.00
01/21/13	AG	Continued assimilation of discovery, document productions and deposition transcripts. Preparation of indexes of each and notebooks containing same.	4.90	\$150.00	\$735.00
01/21/13	NLM	Confer with John T. Palter regarding same. Draft to-do list for Eagle trial preparation. Draft email to Craig W. Stokley regarding outstanding assignment for trial preparation.	7.20	\$225.00	\$1,620.00
01/21/13	WCS	Prepare and circulate joint pretrial order. Send correspondence to opposing counsel regarding framework for agreeing upon terms for joint pretrial order. Send correspondence to client regarding	5.50	\$250.00	\$1,375.00
01/21/13	JTP	Strategy in connection with	1.00	\$395.00	\$395.00
01/22/13	NLM	Review depositions and select excerpts for use at trial and for designation in pretrial order. Review and revise draft exhibit list. Review exhibit list submitted by Hellmann. Confer with W. Craig Stokley regarding exhibits to be used at trial. Draft email to client regarding Review amended and supplemental disclosures.	8.20	\$225.00	\$1,845.00
01/22/13	WCS	Prepare and circulate Eagle's exhibit list. Review and edit deposition designations for Joe Martinez. Review Eagle invoices for production. Review and edit objections to Hellmann's proposed exhibit list.	6.50	\$250.00	\$1,625.00
01/23/13	AG	Review and redact fee statements.	3.90	\$150.00	\$585.00

Page 3 02/01/13 Invoice	e				EAGL01-01
01/23/13	NLM	Draft trial deposition designations. Draft trial witness list. Draft list of contested issues of law for pretrial order. Confer with W. Craig Stokley regarding trial materials and strategy. Review Hellmann trial exhibit list.	7.30	\$225.00	\$1,642.50
01/23/13	WCS	Prepare pretrial materials.	5.50	\$250.00	\$1,375.00
01/24/13	AG	Attention to scanning and labeling Eagle's Trial Exhibits. Preparation of CD containing trial exhibits. Attention to cross-checking and confirming exhibits with exhibits listed on exhibit list. Preparation of revisions to Exhibit List. Attention to service of exhibits on opposing counsel.	9.70	\$150.00	\$1,455.00
01/24/13	NLM	Pursue strategy regarding trial. Conduct legal research regarding	10.30	\$225.00	\$2,317.50
01/24/13	WCS	Prepare pre-trial materials. Circulate comments to joint pre-trial order. Detailed analysis of each of Defendants exhibits and identify all evidentiary objections. Prepare and edit statement listing objections. Draft cover letter for trial subpoenas.	8.50	\$250.00	\$2,125.00
01/25/13	NLM	Draft motion in limine. Draft trial brief. Conduct legal research relating to same. Draft voir dire questions. Confer with W. Craig Stokley regarding same. File trial order and related documents.	8.70	\$225.00	\$1,957.50
01/25/13	JTP	Confer relating strategy associated with argument and authorities in Trial Brief.	1.60	\$395.00	\$632.00
01/25/13	WCS	Prepare, edit, and file trial brief, motion in limine, exhibit lists, witness lists, deposition excerpts, joint pretrial order, jury selection questions, and jury charge. Confer with opposing counsel on same where necessary or appropriate. Send correspondence to opposing counsel. Multiple conference with Nathanial Martinez regarding same. Review filings by Hellmann and create strategy for response. Detailed trial preparation. Review trial subpoenas.	8.00 ces	\$250.00	\$2,000.00
01/28/13	AG	Assimilation of documents and preparation of notebook containing courtesy copies of January 25, 2013 pleadings for the Court. Preparation of correspondence enclosing same. Coordinate delivery of same. Assimilation of documents and preparation of notebook of pretrial pleadings for attorney use. Receipt and review of process service update regarding John McConnell.	3.90 B's	\$150.00	\$585.00

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01/28/13	WCS	Attention to options for responding to Hellmann's aspersions regarding their objections to our exhibit list. Begin preparing trial questions for Everett Zeller.	2.80	\$250.00	\$700.00
01/28/13	NLM	Prepare exhibits for trial. Review filings by Hellman relating to trial. Review trial briefs. Draft and send email to W. Craig Stokley regarding notice of objections. Conduct legal research relating to Confer with W. Craig Stokley regarding same. Draft insert for omnibus response to Defendant's trial briefs.	7.90	\$225.00	\$1,777.50
01/29/13	NLM	Draft response to trial briefs. Conduct research relating to each issues raised by Defendant's trial briefs. Confer with W. Craig Stokley regarding same. Review deposition testimony in preparation for trial.	10.10	\$225.00	\$2,272.50
01/29/13	WCS	Confer regarding response to Hellman's six trial briefs. Attention to methods for getting each exhibit into evidence.	4.80	\$250.00	\$1,200.00
01/30/13	AG	Preparation of Table of Contents and Table of Authorities for Eagle's Response to Defendant's Trial Briefs. Update Exhibits to label them as Plaintiff's Exhibits.	4.80	\$150.00	\$720.00
01/30/13	NLM	Revise and coordinate service of subpoena on David Kang. Coordinate filing of response to trial briefs. Review deposition designations in preparation for with W. Craig Stokley relating to same.	4.50	\$225.00	\$1,012.50
01/30/13	WCS	Review, edit, and confer regarding to response to trial brief.	7.50	\$250.00	\$1,875.00
01/31/13	AG	Coordinate service of David Kang Subpoena. Receipt and review of service confirmation. Confer relating to same.	.30	\$150.00	\$45.00
01/31/13	NLM	Review deposition designations. Draft summary of items that Defendant may raise at trial. Confer with W. Craig Stokley regarding same. Draft response to Defendant's motion for leave to file discovery motion.	7.20	\$225.00	\$1,620.00
01/31/13	WCS	Review Hellman's motion for deemed admissions.	5.20	\$250.00	\$1,300.00
				Total Face:	\$20 447 00

Total Fees: \$39,447.00

Discount: (\$10,000.00)

Total Fees: \$29,447.00

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Expenses:

01/11/13 01/17/13	Xact Data Discovery B/W blowbacks w/slip sheets Trial Supplies – Binders and Index Tabs	\$196.76 \$221.66
01/24/13	Special Delivery Inv.#414181 – Order#024-0221 Delivery from RP to PSSW.	\$ 24.74
01/24/13	Federal Express Tracking Receipt #79459474933	\$ 19.45
01/24/13	Federal Express Tracking Receipt #794594784150	<u>\$ 16.26</u>
		\$478.87

Balance Due: \$ 29,925.87



2712 Amherst Avenue, Dallas, TX 75225 972-653-0196 (Phone) / 214-722-1077 (Fax) TAX ID # 46-1734174

VIA EMAIL: e.zeller@eaglesuspensions.com

Everett Zeller Eagle Suspensions, Inc. 1605 Lakeway Drive Lewisville, TX 75057-6007

Date: 02/15/2013 Invoice Number: 00079 File Number: EAGL01-01

Regarding: Eagle Suspensions, Inc. / Hellmann Worldwide Logistics

Professional services rendered:

1 rojessionai s	<i></i>				
<u>Date</u> 02/01/13	Staff WCS	<u>Description</u> Review and edit response to Hellmann's Motion for Leave. Confer regarding approach to response to Motions in Limini. Attention to presentation of Everett Zeller.	<u>Hours</u> 2.50	<u>Rate</u> \$250.00	<u>Charges</u> \$625.00
02/01/13	NLM	Pursue various pretrial matters. Confer with W. Craig Stokley regarding trial strategy. Draft response to motion for leave to file motion to deem requests for admissions admitted. Draft proposed order regarding same. Draft notice of false certification of conference.	4.60	\$225.00	\$1,035.00
02/02/13	NLM	Revise exhibit list to include objections made by Hellmann and Sponsoring witnesses.	2.00	\$225.00	\$450.00
02/03/13	NLM	Revise exhibit list to include objections by Hellmann and Plaintiff's responses to same. Confer with W. Craig Stokley relating to same. Conduct legal research relating to	1.00	\$225.00	\$225.00
02/03/13	WCS	Finalize direct examination of Everett Zeller. Prepare document showing which exhibits will be used with which witnesses. Continued attention to trial strategy.	5.80	\$250.00	\$1,450.00
02/04/13	NLM	Coordinate vendor for copying and printing of trial notebooks. Conduct legal research relating to Draft email summarizing research. Confer with W. Craig Stokley regarding various trial matters and strategy. Review emails relating to opposing counsel agreement to serve objections to exhibits.	9.20	\$225.00	\$2,070.00

Revise exhibit list to include deposition citations and deposition

exhibit numbers. Pursue exhibits relating to same.

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02/04/13 WC	Attention to pretrial conference issues. Attention to exhibit lists and issues that should be raised at the pretrial conference regarding same. Consider trial strategy options. Prepare voir dire questions.	8.50	\$250.00	\$2,125.00
02/05/13 NL	Review deposition testimony of Shirley Robinson as fact witness and corporate representative. Confer with W. Craig Stokley regarding same. Revise deposition testimony of John Russell. Draft cross examination of John Russell. Review exhibits for trial. Revise notice of false certification. Prepare and coordinate filing of same. Draft email regarding deposition excerpts to be used at trial.	9.30	\$225.00	\$2,092.50
02/05/13 WC	Review and file notice of false certification. Detailed review of Defendant's motion in limine topics. Send correspondence to opposing counsel regarding contact information. Prepare for trial and prepare for issues that may be raised at the pre-trial conference.	7.80	\$250.00	\$1,950.00
02/06/13 AG	Assimilation and highlight of deposition transcript excerpts of Jose Martinez. Attention to transcription of deposition excerpts of Martinez for use at trial. Continued preparation of deposition excerpts for attorney use at trial.	5.60	\$150.00	\$ 840.00
02/06/13 WC	Detailed attention to cross examination of John McConnell. Prepare jury selection approach and opening/closing strategy. Begin David Kang cross examination. Detailed analysis of presentation of exhibit evidence to jury.	9.70	\$250.00	\$2,425.00
02/06/13 NL	Revise direct examination outline for Shirley Robinson. Confer with W. Craig Stokley regarding Joint Pretrial Order. Review emails relating to preparation for pretrial conference. Draft emails relating to same. Revise cross examination outline of John Russell. Review deposition of Jose Martinez. Confer with Alex Gamino regarding deposition excerpt assignment. Draft proposed order regarding request to pre-admit exhibits. Conduct legal research relating to admissibility of discovery responses at trial.	9.00	\$225.00	\$2,025.00
02/07/13 AG	Assimilation of new pleading filings and preparation of notebooks for trial. Confer relating to trial and preparation for same. Attention to logistics for trial. Begin perfecting and assembling electronic Eagle and Hellman exhibits for trial presentation. Attention to importing Eagle trial exhibits into Trial Director for presentment.	4.90	\$150.00	\$ 735.00

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02/07/13	JTP	Attention to logistics for trial and strategy associated with pretrial and trial. Review and analysis of motions in limine and responses thereto, and motions to pre-admit exhibits and objections thereto. Consider and review issue relating to	3.50	\$395.00	\$1,382.50
02/07/13	WCS	Detailed preparation for pre-trial conference. Multiple conferences with Nathanial L. Martinez and John T. Palter regarding legal issues that may arise at the pre-trial conference. Prepare argument out-line and numerous bench briefs for possible issues. Prepare evidentiary folders for proof in support of arguments. Detailed trial strategy.	10.50	\$250.00	\$2,625.00
02/07/13	NLM	Review deposition excerpts for Jose Martinez to be used at trial. Confer with Alex Gamino regarding same. Conduct legal research relating to Conduct legal r	t	\$225.00	\$1,687.50
02/08/13	AG	Travel to the Court to confirm courtroom layout and test trial presentation in electronic courtroom. Confer relating to same. Attention to importing deposition transcripts and exhibits into Trial Director.	4.60	\$150.00	\$690.00
02/08/13	JTP	Confer relating to result and summary of pretrial hearing and review alternatives regarding continuance of trial setting.	.60	\$395.00	\$237.00
02/08/13	NLM	Attend pretrial conference. Attend training on use of courtroom for trial. Confer with W. Craig Stokley regarding settlement offer. Conduct legal research relating to Conduct legal research relating to Confer with W. Craig Stokley regarding same.	6.50	\$225.00	\$1,462.50
02/08/13	WCS	Prepare for and attend pre-trial conference. Multiple conferences with opposing counsel regarding logistics for trial. Attend court electronics training. Send settlement offer to opposing counsel. Attention to trial strategy.	8.80	\$250.00	\$2,200.00
02/09/13	NLM	Conduct legal research regarding	1.80	\$225.00	\$ 405.00

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02/11/13	WCS	Prepare cross examination of David Kang. Confer with Nathanial L. Martinez regarding	3.10	\$250.00	\$ 775.00
02/11/13	NLM	Review trial exhibits. Confer with Craig Stokley regarding	.80	\$225.00	\$ 180.00
02/12/13	NLM	Pursue fact research relating to Review deposition testimony relating to same. Review emails between Everett Zeller and Hellmann pertaining to shipment status. Draft chart for use at trial to determine number of times Everett Zeller asked about the presses.	7.20	\$225.00	\$1,620.00
02/12/13	WCS	Review affidavit filed by opposing counsel. Consider possible trial dates and strategies regarding same. Brief attention to trial preparation. Confer regarding same.	2.30	\$250.00	\$ 575.00
02/13/13	WCS	Continued preparation of cross examination of David Kang.	2.80	\$250.00	\$ 700.00
02/15/13	WCS	Review opposing counsel's medical update to the Court. Confer regarding same.	.50	\$250.00	\$ 125.00
				Total Fees:	\$32,712.00
				Discount:	(\$7,500.00)
				Total Fees:	\$25,212.00
Expenses: 01/28/13		Delivery Inv.#414776 Order #025-0651 Process Service on Jo	ohn McC	Connell	
01/28/13	on 01/2 Special	28/13 I Delivery Inv.#414776 Order #028-0369 Delivery from PSSW	to Judg	e Joe Fish	\$299.25
01/30/13		Delivery Inv.#414776 Order #025-0650 Process Service on Jo	ohn Rus	sell on	\$ 22.47
01/31/13	01/30/1 Special	13 I Delivery Inv.#414776 Order #025-0651 Process Service on D	David Ka	ng on	\$299.25
01/31/13	01/31/1				\$249.25
02/05/13	Court on 01/31/13				\$ 22.47 \$ 443.89
02/08/13		g at Courthouse			\$ 443.89 \$ 5.00
			Tot	al Expenses:	\$1,341.58

Balance Due: \$ 26,553.58

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8115 Preston Road, Suite 600, Dallas, TX 75225 214-888-3120 (Phone) / 214-888-3109 (Fax) TAX ID # 46-1734174

VIA EMAIL: e.zeller@eaglesuspensions.com

Everett Zeller Eagle Suspensions, Inc. 1605 Lakeway Drive Lewisville, TX 75057-6007

Date: 03/01/2013 Invoice Number: 00156 File Number: EAGL01-01

Regarding: Eagle Suspensions, Inc. / Hellmann Worldwide Logistics

Professional services rendered:

<u>Date</u> 02/20/13	Staff WCS	<u>Description</u> Attention to Court's order setting trial to March 18, 2013. Confer regarding same.	Hours .60	<u>Rate</u> \$250.00	<u>Charges</u> \$150.00
02/22/13	AG	Attention to coordinating service of trial subpoenas to David Kang, John McConnell, and John Russell.	.40	\$150.00	\$60.00
02/22/13	NLM	Conduct legal research regarding. Revise subpoenas for trial witnesses. Confer with Craig Stokley regarding same.	1.10	\$225.00	\$247.50
02/22/13	WCS	Attention to trial subpoenas for Kang, McConnell, and Russell.	.50	\$250.00	\$125.00
02/25/13	WCS	Attention to process service issues.	.50	\$250.00	\$125.00

Total Fees: \$ 707.50

Expenses:

02/23/13	Special Delivery Invoice #416431 for Process Service on David Kang	\$299.25
02/23/13	Special Delivery Invoice #416431 for Process Service on John Russell	\$299.25
02/27/13	Special Delivery Invoice #417026 for Process Service on John McConnell	\$344.25

Total Expenses: \$942.75

Balance Due: \$ 1,650.25

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8115 Preston Road, Suite 600, Dallas, TX 75225 214-888-3120 (Phone) / 214-888-3109 (Fax) TAX ID # 46-1734174

VIA EMAIL: e.zeller@eaglesuspensions.com

Everett Zeller
Eagle Suspensions, Inc.
1605 Lakeway Drive
Lewisville, TX 75057-6007

Date: 03/15/2013 Invoice Number: 00218 File Number: EAGL01-01

Regarding: Eagle Suspensions, Inc. / Hellmann Worldwide Logistics

Professional services rendered:

<u>Date</u> 03/08/13	Staff WCS	<u>Description</u> Begin strategizing for trial. Go over witness lists and exhibits.	<u>Hours</u> 3.50	Rate \$250.00	<u>Charges</u> \$875.00
03/11/13	AG	Confirm status of service of trial subpoenas on John McConnell, John Russell and David Kang.	.20	\$150.00	\$ 30.00
03/11/13	WCS	Attention to trial strategy. Confer with client regarding prep sessions. Review docket to confirm all third-party witnesses have been compelled to attend. Begin organizing proof for trial. Order transcript filed by Court reporter from the pre-trial conference.	5.00	\$250.00	\$1,250.00
03/12/13	AG	Confer relating to strategy for trial. Attention to logistics for trial. Begin loading trial exhibits into Trial Director program.	2.40	\$150.00	\$360.00
03/12/13	NLM	Confer with W. Craig Stokley regarding trial strategy and research assignments.	.20	\$225.00	\$ 45.00
03/12/13	WCS	Analyze case material and prepare for trial. Draft David Kang examination outline. Detailed study of David Kang deposition and exhibits from David Kang deposition. Continue to prepare Everett Zeller's direct examination. Add select subject matter to Zeller's examination. Review docket entry regarding pre-trial hearing transcript. Seek copy of transcript for review. Review updated "To-Do" list for trial preparation.	9.50	\$250.00	\$2,375.00

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03/15/13	Invoice

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03/13/13	AG	Continued loading Eagle trial exhibits into Trial Director. Attention to loading Hellman trial exhibits into Trial Director. Attention to loading deposition transcripts into trial director. Confer with Craig Stokley relating to strategy for same. Attend trial preparation sessions with Craig Stokley to review and rehearse direct examinations of Everett Zeller, David Kang, and John McConnell and to rehearse presentation of document exhibits.	6.70	\$150.00	\$1,005.00
03/13/13	NLM	Draft trial brief regarding lost use damages. Conduct legal research regarding same. Pursue strategy for trial.	9.00	\$225.00	\$2,025.00
03/13/13	WCS	Review filing with Court for affidavit of service. Review trial brief regarding research for anticipated issues for trial. Conduct additional research regarding same. Prepare plan for trial presentation. Begin preparing opening argument and charts for demonstratives Detailed review and analysis of Plaintiff's and Defendants exhiblists, and objections thereto. Send correspondence to opposing counsel regarding conference on exhibits. Finish direct examinational outline for David Kang.	it	\$250.00	\$2,450.00
03/14/13	AG	Attention to preparation for trial. Attention to revising presentation of trial exhibits in Trial Director. Attend trial preparation session with Everett Zeller. Confer relating to trial strategy and recommendation for procedure associated with outstanding items.	9.80	\$150.00	\$1,470.00
03/14/13	NLM	Draft trial brief regarding lost use damages. Conduct legal research regarding same. Pursue strategy for trial.	7.60	\$225.00	\$1,710.00
03/14/13	JTP	Confer relating to strategy for trial.	1.20	\$395.00	\$ 474.00
03/14/13	WCS	Attention to direct examination outline of John McConnell. Practice examination with trial director software. Perform same for David Kang examination. Prepare opening statement outline. Brainstorm closing statement options. Prepare trial presentation strategy. Review chart of Everett Zeller emails to be used as a demonstrative aid for trial.	10.80	\$250.00	\$2,700.00
03/15/13	AG	Attention to trial preparation. Attention to review of examination outlines and revision of, and presentation of trial exhibits in Trial Director.	9 ■ .60	\$150.00	\$1,440.00

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EAGL01-01

03/15/13 NLM Trial preparation. Confer with Alex Gamino regarding 8.50 \$225.00 \$1,912.50

demonstratives and trial exhibits. Pursue deposition transcripts and deposition signatures for trial. Revise draft of direct examination for John Russell and Shirley Robinson. Confer

with W. Craig Stokley regarding same.

03/15/13 WCS Prepare direct examination of Wayne Robinson. 10.20 \$2,550.00 \$250.00

> Prepare for direct examination of Eagle Suspension witnesses. Attention to correspondence from Court regarding courtroom assignment. Review transcript from joint pre-trial conference. Review order regarding conduct of trial. Confer with opposing counsel regarding agreement on pre-admitted exhibits. Review second amended exhibit list filed by Defendant.

> > **Total Fees:** \$ 22,671.50

> > **Balance Due:** \$ 22,671.50



8115 Preston Road, Suite 600, Dallas, TX 75225 214-888-3120 (Phone) / 214-888-3109 (Fax) TAX ID # 46-1734174

VIA EMAIL: e.zeller@eaglesuspensions.com

Everett Zeller
Eagle Suspensions, Inc.
1605 Lakeway Drive
Lewisville, TX 75057-6007

Date: 04/01/2013 Invoice Number: 00236 File Number: EAGL01-01

Rate

Charges

Hours

Regarding: Eagle Suspensions, Inc. / Hellmann Worldwide Logistics

Description

Professional services rendered:

Staff

<u>Date</u>

03/16/13	ĀĠ	Attention to trial preparation. Assimilation of documents and preparation of three additional notebooks of Plaintiff's Trial Exhibits. Assimilation of documents and preparation of notebook of Hellman's Trial Exhibits. Attention to rehearsal of examination of witnesses with Nathanial Martinez. Preparation of Craig Stokley's trial notebook. Preparation of Alex Gamino's trial notebook. Attention to logistics for trial. Attention to highlighting the Joe Martinez deposition transcript for use at trial		\$150.00	\$1,440.00
03/16/13	NLM	Trial preparation. Review outlines and exhibits for direct examination of John Russell and Shirley Robinson. Draft cross examination outline for Mark Sola. Review pretrial disclosures and order. Revise PowerPoint presentation for opening statement Prepare Joe Martinez deposition designations for use at trial. Review list of document to be offered by Hellmann at trial. Pursue strategy regarding trial.	10.90 t.	\$225.00	\$2,452.50
03/16/13	WCS	Review original invoices from Hellmann. Prepare for trial. Finalize opening statement and corresponding power point. Go over direct examination of each witness, and possible cross examination topics. Detailed study of exhibits that will likely be used at trial. Attention to authentication issues with Defendant's exhibits. Prepare potential impeachment exhibits. Review deposition transcript for David Kang, John McConnell, and Everett Zeller. Practice opening statement. Prepare demonstratives of leaf springs for trial. Review correspondence from opposing counsel regarding Defendant's exhibit 28.	12.80	\$250.00	\$3,200.00

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03/17/13	AG	Attention to trial preparation. Finalize highlighting deposition of Joe Martinez. Attention to revising exhibits for trial presentation. Attention to rehearsal of examination of witnesses with Nathanial Martinez.		\$150.00	\$1,605.00
		Confer relating to trial strategy.			
03/17/13	NLM	Trial preparation. Confer with Everett Zeller regarding Confer with Craig Stokley regarding same.	5.80	\$225.00	\$1,305.00
03/17/13	JTP	Review and analysis of case theme, jury selection, opening argument, witness order and question strategies and exhibits.	2.50	\$395.00	\$ 987.50
03/17/13	WCS	Finalize opening statement power point. Review and practice direct examinations of first day witnesses – David Kang, John McConnell, Joe Martinez. Practice opening statement. Attention to closing statement power point. Send correspondence to opposing counsel setting out demonstrative aids and anticipated trial witnesses for the first day. Confer regarding jury selection strategy.	11.40	\$250.00	\$2,850.00
03/18/13	AG	Attend and participate at trial. Attention to revising trial exhibits and updating trial exhibits on Trial Director.	11.50	\$150.00	\$1,725.00
03/18/13	NLM	Trial preparation. Attend trial. Confer with Craig Stokley and Everett Zeller regarding Conduct legal research regarding Conduct legal research regarding Conduct legal research regarding Confer with Craig Stokley regarding Confer with Craig Stokley regarding same.	13.50	\$225.00	\$3,037.50
03/18/13	WCS	Final trial preparation. Attend trial – jury selection, opening statement, direct examination of John McConnell, and David Kang. Prepare for second day of trial.	14.00	\$250.00	\$3,500.00
03/19/13	AG	Attend and participate at trial.	10.20	\$150.00	\$1,530.00
03/19/13	NLM	Trial preparation. Attend trial. Conduct direct examination of John Russell. Prepare and argue response to motion for judgment as a matter of law. Confer with Craig Stokley and Everett Zeller regarding	10.50	\$225.00	\$2.362.50
03/19/13	WCS	Prepare for second day of trial. Attend second day of trial – present David Kang, John Russell, Joe Martinez, Everett Zeller, Wayne Robinson. Finalize closing statements and closing powerpoint. Detailed research regarding possible cross examination points for Mark Sola. Review Mark Sola's affidavit and other materials submitted by Mark Sola.	15.30	\$250.00	\$3,825.00

			Tota	l Fees:	\$ 40,345.00
03/28/13	WCS	Attention to issues related to judgment. Telephone call with Tom Nork regarding attorney fee motion. Calculate pre-Judgment interest and attorney fees. Confer with client.	2.30	\$250.00	\$575.00
03/28/13	NLM	Confer with Craig Stokley regarding draft final judgment. Conduct research regarding	1.00	\$225.00	\$225.00
03/27/13	WCS	Confer with client regarding Research issues related to	2.80	\$250.00	\$700.00
03/26/13	WCS	Send update to client. Confer with Everett Zeller regarding	1.50	\$250.00	\$375.00
03/22/13	WCS	Continued attention to issues related to Confer with John Palter regarding same. Calculate pre-judgment interest on claims. Calculate attorney fees for entire case. Begin preparing attorney fee application.	3.80	\$250.00	\$ 950.00
03/21/13	WCS	Review issues related to trial. Consider sequence for post -trial matters, if any. Review and research issues and considerations related to Confer with Nathanial Martinez and John Palter regarding same.	4.60	\$250.00	\$1,150.00
03/21/13	NLM	Confer with Craig Stokley regarding final judgment.	.30	\$225.00	\$67.50
03/20/13	WCS	Continued preparation for final day of trial. Attend final day of trial – cross examine David Kang and Mark Sola, re-direct examination of Everett Zeller, closing arguments, objections to jury charge. Detailed attention to jury charge. Receive verdict.	11.50	\$250.00	\$2,875.00
03/20/13	NLM	Trial preparation. Revise closing statement PowerPoint presentation. Attend trial. Confer with Craig Stokley and Everett Zeller regarding	9.50	\$225.00	\$2,137.50
03/20/13	AG	Attend and participate at trial.	9.80	\$150.00	\$1,470.00
Page 3 04/01/13 Invoice	e				EAGL01-01

P's Appx. 98

Balance Due: \$ 40,345.00



8115 Preston Road, Suite 600, Dallas, TX 75225 214-888-3120 (Phone) / 214-888-3109 (Fax) TAX ID # 46-1734174

VIA EMAIL: e.zeller@eaglesuspensions.com

Everett Zeller

Eagle Suspensions, Inc. 1605 Lakeway Drive

Lewisville, TX 75057-6007

Date: 04/11/2013 Invoice Number: 00290

File Number: EAGL01-01

Regarding: Eagle Suspensions, Inc. / Hellmann Worldwide Logistics

Professional services rendered:

<u>Date</u> 04/01/13	Staff WCS	Description Correspond with Tom Nork regarding resolution of entire matter and attorney fee motion. Analysis concerning form of judgment. Analysis concerning attorney fee application. Confer with Nathanial Martinez regarding same.	<u>Hours</u> 4.80	<u>Rate</u> \$250.00	<u>Charges</u> \$1,200.00
04/02/13	WCS	Detailed written correspondence with opposing counsel regarding final resolution of matter. Attention to	3.20	\$250.00	\$800.00
04/03/13	NLM	Conduct legal research regarding Redact bills for use in application for fees.	4.30	\$225.00	\$967.50
04/03/13	WCS	Confer with opposing counsel regarding options for reaching	2.50	\$250.00	\$625.00
04/04/13	NLM	Review and redact Eagle invoices and bills for use in application for fees. Confer with W. Craig Stokley regarding	3.90	\$225.00	\$877.50
04/08/13	NLM	Confer with W. Craig Stokley regarding	3.00	\$225.00	\$675.00
04/08/13	WCS	Research issues related to entering final judgment. Confer regarding same. Review past final judgments entered by Judge Fish.	2.50	\$250.00	\$625.00
04/09/13	NLM	Draft final judgment. Conduct legal research regarding same.	4.30	\$225.00	\$967.50
04/09/13	wcs	Review and analyze draft final judgment.	1.50	\$250.00	\$375.00

Page 2

04/15/13 Invoice EAGL01-01

04/10/13	NLM	Confer with W. Craig Stokley regarding	.50	\$225.00	\$112.50
04/10/13	WCS	Review and finalize proposed final judgment. Send same to Court for entry.	1.80	\$250.00	\$450.00
04/11/13	WCS	Confer with client regarding Send correspondence related same.	2.30	\$250.00	\$575.00
			Total Fee	es: \$	8,250.00

Expenses:

Parking at Trial (4 days @ \$8.00 per day - 02/08, 03/18-03/20/13) \$32.00

Total Expenses: \$ 32.00

Balance Due: \$ 8,282.00

EXHIBIT C

Preston Commons East 8115 Preston Road, Suite 600 Dallas, TX 75225 Main Line: (214) 888-3110

HOME FIRM PROFILE AREAS OF PRACTICE ATTORNEYS IN THE NEWL CONTACT US

John T. Palter, Esq.

"Litigation is merely one means to an end. It is the result that matters. I strive to provide the research and wisdom, on a real-time basis, to make winning decisions."

With more than twenty years of experience advocating the interests of individual, emerging growth and institutional clients in complex commercial, amployment and intellectual property disputes. John Palter has served as lead and local counsel in numerous jury and bench trials and arbitrations in cases involving securities, accounting, intellectual property, copyright and trademark infringement, trade secrets, non-compete agreements, employment, insurance coverage, all and gas, dissenter's rights, deceptive trade practices, quasi-torts, and pre- and post-judgment collections. Where appropriate, John employs alternative dispute resolution methods to successfully resolve complex commercial disputes prior to formal litigation or trial.

John has served as lead counsel in jury trials and arbitrations involving complex GAAP accounting, accounting negligence, securities and intellectual property matters. He has represented clients throughout the country in multi-district and multi-venue litigation before State and Federal Courts, FINRA and the American Arbitration Association

SELECTED CLIENT REPRESENTATION

ACCOUNTING LITIGATION

- Represented a national corporation, as seller, in a post-closing purchase price adjustment dispute before the American Arbitration Association. Secured favorable award on all claims following arbitration on the merits.
- Represented a holding company of numerous local exchange carriers in an accounting malpractice case, Secured a favorable award after arbitration on the merits.
- Represented individual and corporate plaintiffs against accounting firm and members asserting claims for negligence, fraud and breach of fiduciary duty in connection with pension and profit sharing plan. Case successfully tried to jury and affirmed by the Texas Court of Appeals.

 Complex Contract Litigation
- Represented an international corporation in a breach of contract case and defense of numerous intellectual property issues. Secured favorable settlement
- Defended a business owner against allegations of breach of franchise and purchase and sale agreements, and breach of trade secrets. Case was favorably settled by restructuring contractual agreements.
- Successfully defended a real-estate developer in a multi-million dollar post-closing adjustment and breach of contract case.

EMPLOYMENT LITIGATION

- Defended a non-profit entity and individuals in a lawsuit involving sexual harassment and fraudulent concealment. Filed and argued Special Appearance to Present Motion Objecting to Personal Jurisdiction of the Court, which resulted in dismissal of claims against individual client. Balance of the claims settled favorably at mediation.
- Represented a non-profit entity against a claim of wrongful discharge. Obtained a dismissal of all claims via a Motion to Dismiss Claims under ERISA.
- Successfully secured more than 150 emergency orders of injunctive relief in State and Federal Courts while representing employers in employment defection, non-compete and trade secret cases; successfully defended matter on appeal to United States Court of Appeals for the 5th Circuit. Intellectual Property Litigation
- Represented a local software company against publicly-traded education company based upon



Direct: (214) 888-3111 Mobile: (214) 478-9280 Fax: (214) 888-3109

Email: jpalter@palterlaw.com

Vcard: 2"

Education:

Drake University School of Law J.D., 1985

Order of the Barristers Recipient, M. Gene Blackburn Appellate Brief Award

TVVCII G

Northern Illinois University B.S. in Finance, 1982

Admitted to Practice:

State of Texas
State of New Mexico
United States Supreme Court
United States Court of Appeals
Second Circuit
Fifth Circuit
Federal Circuit
United States District Court
Northern, Southern, Eastern and
Western Districts of Texas
United States District Court
Southern District of New York
Internal Revenue Service

Professional Affiliations:

American Bar Association
Intellectual Property Section
Commercial Litigation Section
Dallas Bar Association
Commercial Litigation Section
Certified Public Accountant - Texas
State Board of Public Accountancy
PS Appx. 102

claims for Casch of 12 ccy-006111 - Gring Poch, ment 116 race secrets 4/24/13 overlange 106 references settlement award.

Certified Public Accountants

- Represented a publicly-traded online data provider in defense of copyright and conversion claims. Case satisfactorily resolved through confidential settlement.
- Represented a publicly-traded online data provider in prosecution of copyright and conversion claims. Case satisfactorily resolved through confidential settlement.
 Oil and Gas Litigation
- Represented a publicly-traded oil and gas development and production company. Obtained final summary judgment on all affirmative claims and defenses.
 Securities Litigation
- Represented over thirty individual and corporate investors as plaintiffs. The matter was favorably settled at conclusion of three month jury trial, with several interlocutory appeals taken to the United States Court of Appeals for the Second Circuit.
- Successfully prosecuted an investor claim involving day trading, margins, suitability and unauthorized trading.

RECENT PUBLICATIONS

- Lawline Continuing Legal Education, Accountant Malpractice: Avoidance and Defense
- State Bar of Texas Continuing Legal Education, Spring 2008 Update on Business Valuation Cases Business Termination Issues
- State Bar of Texas Continuing Legal Education, Fall 2008 Business Termination Issues
- University of Houston Law School, Continuing Legal Education, Spring 2009 Business Termination Issues
- · Dallas Business Journal Contributor
- Fort Worth Business Journal Contributor
- Subprime's Impact on the 2008 Presidential Race: An Immediate Look at the Legal, Governmental, and Economic Ramifications of the Subprime Crisis on the Bush Administration and the 2008 Presidential Election, Walter Williams, Bryan D. Jones, Gary E. Lacefield, John T. Paller @West Publishing 2008

return to top of page

Preston Commons East, 8115 Preston Road, Suite 600, Dallas, TX 75225

Main Line: (214) 888-3110 Fax: (214) 888-3109

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Recent Honors:

Named a "Texas Super Lawyer" seven times, appearing in Texas Monthly Magazine/Law and Politics Magazine.

EXHIBIT D

Case 3:12-cv-00611-G Document 116 Filed 04/24/13 Page 108 of 178 PageID 2371



Preston Commons East 8115 Preston Road, Suite 600 Dallas, TX 75225 Main Line: (214) 888-3110

FIRM PROFILE - AREAS OF PRACTICE - ATTORNEYS In THE NEWS CONTACT US

Nathanial L. Martinez, Esq.

Nathanial L. Martinez is an associate attorney with experience in complex commercial litigation in both state and federal court in areas of general contract and business tort law. His experience includes pursuing and defending claims for breach of contract, preach of fiduciary duty, fraud, trademark infringement, unfair competition, tortious interference, conspiracy, and misappropriation of trade secrets. Mr. Martinez also has experience in constitutional law, employment discrimination, and trust and estate litigation.

Mr. Martinez received his Bachelor of Arts degree in Government from The University of Texas at Austin in 2006, Mr. Martinez then attended the J. Reuben Clark Law School at Brigham Young University in Provo, Utah, and graduated in 2010.

While in law school, Mr. Martinez was a member of the BYU Law Review, Phi Delta Phi legal traternity, and served on the BYU Moot Court Board of Advocates. Because of his wide success in intra-school advocacy competitions, he was selected to represent his school at the American Bar Association (ABA) National Appellate Advocacy Competition. In addition, Mr. Martinez received the J. Reuben Clark Faculty Award for Menitorious Achievement and Distinguished Service. During law school, Mr. Martinez served as an intern for Magistrate Judge Frances H. Stacy of the U.S. District Court for the Southern District of Texas and the Honorable Timothy Taft of the Texas First Court of Appeals.

SELECTED CLIENT REPRESENTATIONS

- Represented U.S. manufacturer and distributor in pursuit of claims against former international licensee for breach of contract, breach of fiduciary duties, fraud, and misappropriation of trade secrets.
- Obtained settlement in favor of clients pursuing claims against North Texas school district for racial discrimination and wrongful termination.



Direct: (214) 888-3114 Mobile: (512) 659-4504 Fax: (214) 888-3109

Email: nmartinez@palterlaw.com

Vcard: ♣*

Education:

J.D., J. Reuben Clark Law School, Brigham Young University, 2010 B.A., Government, University of Texas at Austin, 2006

Admitted to Practice:

State Bar of Texas: U.S. District Courts for the Northern, Southern, Eastern, and Western Districts of Texas

Professional Affiliations:

Dallas Bar Association Committee on Legal Ethics Texas Young Lawyers Association J. Reuben Clark Law Society

return to top of page

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EXHIBIT E



Mahsa Soheil

Mahsa Soheil is a member of Dentons' Litigation and Dispute Resolution practice.

Recognition

Honors and Awards

· Recipient, Robert B. Acomb Award for Most Outstanding Comment, Tulane Maritime Law Journal

Insights

 "The Relationship, If Any, Between Misrepresentation and the Reinjury: The Fifth Circuit Suggests that Willful Concealment of Pre-Existing Medical Condition May Constitute Contributory Negligence in Johnson v. Cenac Towing, Inc.," Tulane Maritime Law Journal, 2011

Activities and Affiliations

Memberships

- · Member, Dallas Bar Association
- . Member, Dallas Association of Young Lawyers
 - Member, Dallas Association of Young Lawyers Leadership Class of 2012/2013
- Member, American Bar Association
- · Member, Attorneys Serving the Community
- Member, Dallas Women Lawyers Association Member, Dallas Volunteer Attorney Program

Prior and Present Employment

While in law school, Mahsa served as managing editor for the Tulane Maritime Law Journal. She also interned for the Honorable Stephen Wm. Smith of the US District Court for the Southern District of Texas, Houston Division.

Prior to joining Dentons, Mahsa practiced at Riney Palter, PLLC, a boutique commercial litigation firm.

Contact information

Dallas

D +1 214 259 0926 mahsa.soheil@dentons.com

Areas of focus

Practices

Arbitration

Class Action Defense

Commercial Litigation

Competition and Antitrust Litigation

Energy Litigation

Environmental Litigation

Intellectual Property Litigation

Litigation and Dispute Resolution

Pharmaceutical and Medical Device

Litigation

Product Liability Litigation

Industry sectors

Energy

Life Sciences

Life Sciences and Health Care

Technology

Education

Tulane University Law School, 2011, JD, Managing Editor, Tulane Maritime Law Journal

University of Miami, 2006, BS, summa cum laude, Finance

Admissions and qualifications

Texas

US District Court for the Eastern District of Texas

US District Court for the Northern District of Texas

US District Court for the Southern District of Texas

US District Court for the Western District of Texas

1/1

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www.dentons.com/en/mzhsa-soheil

EXHIBIT F

Expense: ase 3:12-cv-00611-G Document 116 Filed 04/24/13	Page 112	of 178 PageID 2375
Filing Fees:		1
Federal Court - Petition	\$ 350.00	1
Tarrant County District Clerk		1
	\$ 607.00	1
Process Service:		1
Process Service - John McConnell - Special Delivery Invoice #417026 on 02/27/13	\$ 344.25	1
Process Service - David Kang - Special Delivery Invoice #416431 on 02/25/13		1
Process Service - John Russell - Special Delivery Invoice #416431 on 02/25/13		1
Process Service - David Kang - Special Delivery Invoice #414776 on 01/31/13	-	1
Process Service - John Russell - Special Delivery Invoice #414776 on 01/30/13	\$ 299.25	Ī
Process Service - John McConnell - Special Delivery Invoice #414776 on 01/28/13	\$ 299.25	1
Process Service - John McConnell - Texas Pictorial Invoice #1397 on 11/16/12		1
Process Service - Jose Martinez - Texas Pictorial Invoice #1373 on 10/24/12		1
Process Service - John McConell Special Delivery Invoice #407430 on 10/24/12		1
Process Service - Hellman Worldwide - Zip Delivery Invoice #18085-2120 on 03/12/12		1
Process Service - Hellman Worldwide - Special Delivery Invoice #382331 on 12/01/11		1
	\$ 2,449.46	1
Court Reporters:		1
Deposition - Jose Martinez (Alfonso DeLeon) on 11/16/12	\$ 1,294.00	1
Deposition - John McConnell (Constantin & Associates) on 11/15/12		1
Deposition - Everett Zeller (U.S. Legal Support) on 11/14/12		1
Deposition - Shirley Robinson (U.S. Legal Support) on 11/14/12		1
Deposition - John Russell (Word for Word) on 08/08/12		1
	\$ 3,401.56	
Copy Service:	V 5,452.55	-{
Xact Data Invoice #30-02093	\$ 443.89	†
Xact Data Invoice #30-02015		1
7000 5000 HIVOICE H35 52523	\$ 640.65	†
Delivery Service:	0.00	1
Delivery Service - Special Delivery Invoice #414776 on 01/31/13	\$ 22.47	†
Delivery Service - Special Delivery Invoice #414776 on 01/28/13		1
Delivery Service - Special Delivery Invoice #414181 on 01/24/13		1
Delivery Service - Eagle Express Invoice #RPX1-877 on 09/24/12		1
Delivery Service - Eagle Express Invoice #RPX1-877 on 09/24/12		1
Delivery Service - Special Delivery Invoice #403551 on 09/04/12		1
Delivery Service - Zip Delivery Invoice #18085-2092 on 02/29/12		4
Delivery Service - Special Delivery Invoice #382889 on 12/01/11		-
Delivery Service - Special Delivery Invoice #381789 on 11/30/11		†
Dentery derived Special Servery Intoice 1352705 011 11/30/11	\$ 192.94	
Federal Express:	232.34	†
Fed Ex Tracking Receipt #794594714933 on 01/24/13	\$ 19.45	i
Fed Ex Tracking Receipt #794594784150 on 01/24/13		1
Fed Ex Tracking Receipt #793234353322 on 02/15/12		1
Fed Ex Tracking Receipt #793165195683 on 01/27/12		1
	\$ 65.82	1
	, , , , , , , , , , , , , , , , , , , ,	1
Secretary of State:		1
Secretary of State Search on 12/05/11	\$ 2.00	1
Secretary of State Search on 11/02/11		1
Secretary of State Search on 10/12/11		1
1	\$ 6.00	1
Travel Expenses:		1
Parking at Court during Trial (02/08 & 03/18-03/20/13)	\$ 32.00	1
Parking at Court during Trial (02/08 /13)		1
Travel expenses to Laredo for multiple depositions on 11/14/12		1
Travel expense on 11/06/12		1
Travel expense on 10/30/12		1
Mileage & Parking to Fort Worth for Hearing on 01/06/12		1
	\$ 858.42	1
Trial Supplies:		(Misc. costs subtotal)
Office Max	\$ 221.66	\$ 1,344.84
		1
TOTAL EXPENSES:	\$ 8,443.51	1
		•

Riney, Palter PLLC Everett Zeiler

3/01/2012 Page No.: 2

Expenses

Start Date 2/15/2012	Description Federal Express	Quantity 1.00	Charges \$13.60
2/29/2012	Filing fees - Petition in Federal Court	1.00	\$350.00
		Total Expenses	\$363.60
Total New	Charges	-	\$4,988.60
Previous Ba	alance		\$2,104.01
Total Paym	ents and Credits	-	\$-2,104.01
Balance Du	e	_	\$4,988.60

RINEY PALTER PLLC

CHECK REQUEST

To: Tarvant Courty District	Date: 1/~1/7-11	
Tarrant County District Clerk	Voucher:	
	Amount; # 257 €	
TRUST ACCOUNT BALANCE		
FILE NUMBER: EAGLO1-01	INVOICE NUMBER:	
DESCRIPTION:		
filing ter to	Petition (1249) +	300 A
ritation (#8)		
ENTERED – TIME MATTERS	GENERAL LEDGER CODE	
C/M#: Amount:	General Ledger Amount Code	
Date: By:		
Conf#:		
Craia Stokley / imp		
Requested By / / U	Signing Director	
Approved By Return to:	When Needed: (\-('7	
Mail to:		<u> </u>

Thomas A. Wilder
District Clerk
Tarrant County, Texas

330082276	Mon	November	21, 2011 12:56PM
Cause Numbe	er 3	42-256606	 -11
IN RE: EAGLE	s su	SPENSIONS	, INC
Description	n		Fees
COURT COST (PAID) COURT COST (PAID)			249.00 8.00
Sub Total for the	his	Cause	257.00
Total Amount Re Paid Che		732:	\$257.00 \$257.00

File desk assistant LEANNA says...
THANK YOU!

GRAND TOTAL FOR ALL TRANSACTIONS

******\$257.00

Received of RINEY PALTER PLLC 1532



PALTER STOKLEY SIMS WRIGHT ATTN: JOHN PALTER 8115 PRESTON RD, STE 600 DALLAS, TX 75225

ORIGINAL INVOICE

Special Delivery Service, Inc.

5470 L.B.J. Freeway Dallas, TX 75240 (214) 866-3200 • Fax (214) 866-3201

INVOICE NUMBER	INVOICE DATE	INVOICE AMOUNT
417026	03/02/13	\$ 394.81
2144789280	THIS INVOICE IS	
ACCOUNT NUMBER	PAYABLE IMMEDIATELY UPON RECEIPT	AMOUNT ENCLOSED

	▼ Detach at Perforation And Return This Top Portion With Your Payment ▼		
TRACKING # CALLER REFERENCE	DELIVERY INFORMATION	RECEIVED BY TIME DATE	TOTAL
053-0693 A GAMINO EAGLE/HELLMA	PROCESS SERVING: JOHN MCCONNELL HAS BEEN SUCCESSFULLY SERVED. AT: 1454 HAMPTON RD GRAPEVINE, TX 76051 BY SERVER ADAM BRIDGEWATER THREE HOUR SERVING = \$ 169.50 • OUT OF COUNTY = \$ 50.00 • WITNESS FEE = \$ 65.00 ADVANCE FEE = \$ 14.75 • SERVED AT SECOND ADDRESS = \$ 45.00	J MCCONNELL 9:35 AM 02/27/13	\$ 344.25
057-0160 A GAMINO MCCLUNG/DEN	TO: BELL NUNNALLY & MARTIN LLP 3232 MCKINNEY, STE 1400 DALLAS, TX 75204 FROM: PALTER STOKLEY SIMS WRIGHT 1933 LEVEE DALLAS, TX 75207 STANDARD DAYTIME DELIVERY = \$ 22.47	A BERTEOTTI 2:13 PM 02/26/13	\$ 22.47
057-0164 A GAMINO MCCLUNG/DEN	FROM: BELL NUNNALLY & MARTIN LLP 3232 MCKINNEY, STE 1400 DALLAS, TX 75204 TO: PALTER STOKLEY SIMS WRIGHT 1933 LEVEE DALLAS, TX 75207 STANDARD EVENING DELIVERY = \$ 28.09	A GAMINO 2:38 PM 02/26/13	\$ 28.09
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ŀ	PAGE	invoice number	INVOICE AMOUNT ALL	ACCOUNT BALANCE	CHECKINO	DATE PAID	AMOUNT PAID
И	1	417026	394.81	993.31			
							

Thank you! We Appreciate Your Business. For Questions Regarding this Invoice, please Call Bill McNutt at (214) 866-3220 or Send an Email to Bill.McNutt@SpecialDelivery.com



PALTER STOKLEY SIMS WRIGHT ATTN: JOHN PALTER 1933 LEVEE 2712 AMHERST DALLAS, TX 75225

ORIGINAL INVOICE

Special Delivery Service, Inc.

5470 L.B.J. Freeway Dallas, TX 75240 (214) 866-3200 • Fax (214) 866-3201

INVOICE NUMBER	INVOICE DATE	INVOICE AMOUNT
416431	02/23/13	\$ 598.50
2144789280	THIS INVOICE IS	
ACCOUNT NUMBER	PAYABLE IMMEDIATELY UPON RECEIPT	AMOUNT ENCLOSED

▼ Detach at Perforation And Return This Top Portion With Your Payment

re a constant and the	V Delacti at refloration And Neturn this top Portion with four Payment V	error a complete	
TRACKING # CALLER REFERENCE	DELIVERY INFORMATION	RECEIVED BY TIME DATE	TOTAL AMOUNT
053-0690 A GAMINO EAGLE/HELLMA	PROCESS SERVING: DAVID KANG HAS BEEN SUCCESSFULLY SERVED. AT: 1200 MINTERS CHAPEL RD, STE 300 GRAPEVINE, TX 76051 BY SERVER ADAM BRIDGEWATE THREE HOUR SERVING = \$ 169.50 • OUT OF COUNTY = \$ 50.00 • WITNESS FEE = \$ 65.00 ADVANCE FEE = \$ 14.75	D KANG 8:20 AM 02/25/13	\$ 299.25
053-0694 A GAMINO EAGLE/HELLMA	PROCESS SERVING: JOHN RUSSELL HAS BEEN SUCCESSFULLY SERVED. AT: 801 HANOVER DRIVE, STE 250 GRAPEVINE, TX 76051 BY SERVER ADAM BRIDGEWATER THREE HOUR SERVING = \$ 169.50 • OUT OF COUNTY = \$ 50.00 • WITNESS FEE = \$ 65.00 ADVANCE FEE = \$ 14.75	J RUSSELL 8:30 AM 02/25/13	\$ 299.25
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			/ a
		,	\ Q\$

PAGE	INVOICE NUMBER	INVOICE AMOUNT	ACCOUNT/BALANCE	CHECKINO	o DATE PAID A	AMOUNT: PAID
1	416431	598.50	647.98			

Thank you! We Appreciate Your Business. For Questions Regarding this Invoice, please Call Bill McNutt at (214) 866-3220 or Send an Email to Bill.McNutt@SpecialDelivery.com



PALTER STOKLEY SIMS WRIGHT ATTN: JOHN PALTER 1933 LEVEE 2712 AMHERST DALLAS, TX 75225

ORIGINAL INVOICE

Special Delivery Service, Inc. 5470 L.B.J. Freeway Dallas, TX 75240 (214) 866-3200 • Fax (214) 866-3201

INVOICE NUMBER	INVOICE DATE	INVOICE AMOUNT
414776	02/02/13	\$ 892.69
2144789280	THIS INVOICE IS	
CACCOUNT NUMBER	PAYABLE! FIMMEDIATELY: UPON RECEIPT	AMOUNT

▼ Detach at Perforation And Return This Top Portion With Your Payment S

<u> </u>	▼ Detach at Perforation And Return This Top Portion With Your Payment ▼		
TRACKING # CALLER REFERENCE	DELIVERY INFORMATION	V RECEIVED BY	TOTAL AMOUNT
031-0281 K BURKHART EAGLE	TO: U S DISTRICT COURT - DALLAS 1100 COMMERCE ST, RM 1452 DALLAS, TX 75242 FROM: PALTER STOKLEY SIMS WRIGHT 1933 LEVEE DALLAS, TX 75207 STANDARD DAYTIME DELIVERY = \$ 22.47	T ALLEN 11:26 AM 01/31/13	\$ 22.47
028-0369 A GAMINO EAGLE/HELLMA	TO: JUDGE JOE FISH 1100 COMMERCE DALLAS, TX 75242 FROM: PALTER STOKLEY SIMS WRIGHT 1933 LEVEE DALLAS, TX 75207 STANDARD DAYTIME DELIVERY = \$ 22.47	J ROGERS 1:45 PM 01/28/13	\$ 22.47
031-0205 A GAMINO EAGLE/HELLMA	PROCESS SERVING: DAVID KANG HAS BEEN SUCCESSFULLY SERVED. AT: 1200 MINTERS CHAPEL RD, STE 300 GRAPEVINE, TX 76051 BY SERVER JOE CLEWIS THREE HOUR SERVING = \$ 169.50 • WITNESS FEE = \$ 65.00 • ADVANCE FEE = \$ 14.75	D KANG 10:54 AM 01/31/13	\$ 249,25
025-0651 A GAMINO EAGLE/HELLMA	PROCESS SERVING: JOHN MCCONNELL AT: 1454 HAMPTON RD GRAPEVINE, TX 76051 BY SERVER JOE CLEWIS THREE HOUR SERVING = \$ 169.50 • OUT OF COUNTY = \$ 50.00 • WITNESS FEE = \$ 65.00 ADVANCE FEE = \$ 14.75	J MCCONNELL 8:59 AM 01/28/13	\$ 299.25
025-0650 A GAMINO EAGLE/HILLMA	PROCESS SERVING: JOHN RUSSELL HAS BEEN SUCCESSFULLY SERVED. AT: 801 HANOVER DRIVE, STE 250 GRAPEVINE, TX 76051 BY SERVER JOE CLEWIS THREE HOUR SERVING = \$ 169.50 • OUT OF COUNTY = \$ 50.00 • WITNESS FEE = \$ 65.00 ADVANCE FEE = \$ 14.75	J RUSSELL 8:41 AM 01/30/13	\$ 299.25
		√c	iert QB
Forest Control	CE MINDED		

PAGES SINVOICE NUMBERS AMOUNT ACCOUNT ACCOUNT

Thank you! We Appreciate Your Business. For Questions Regarding this Invoice, please Call Bill McNutt at (214) 866-3220 or Send an Email to Bill.McNutt@SpecialDelivery.com

RINEY PALTER PLLC

CHECK REQUEST

To: Texas Pictorial	Date: (1-20-12
LEVARO I LEIRAVET	Voucher:
	Amount: \$ (50,00
TRUST ACCOUNT BALANCE	
FILE NUMBER: EAGLOL-OL	INVOICE NUMBER: 1397
DESCRIPTION:	
Confirm. for Deposition	n of John McCommell
in Laredo, TX	
ENTERED – TIME MATTERS	GENERAL LEDGER CODE
C/M#: Amount;	General Ledger Amount Code
Date:	
By: Conf#:	
NLM June	
Requested By	Signing Director
Approved By	
Return to:	When Needed:
Mail to: Texas Pictorial	



2611 East Elm Street Laredo, Texas 78043 724-7441 E-mail: depopro@stx.rr.com

Invoice Number: 1397
Invoice Date: Nov 16, 2012
Page: 1

Nathanial Martinez Riney Palter, PLLC 5949 Sherry Lane, Suite 1616 Dallas, TX 75225-8009 Nathanial Martinez Riney Palter, PLLC 5949 Sherry Lane, Suite 1616 Dallas, TX 75225-8009

Cystom	erID:		as Pictorial Employer ID No.	的程序到 。		ns .
MARTN					Net 30 Day	
Sales R	Sales Rep ID Shipping Method		Shipping Method	Ship E	ate 🗽 🎏	⊞Due Date
GONZG	EO-01		US Mail			12/16/12
Quantity :	ltem		Description	in the Control of the	iit Price	Amount
	RENCONFD		Conference Room Rental/Food & Driv Eagle Suspensions, Inc. VS Hellman Worldwide Logistics; Depo of Joe Ma 11-16-12		150.00	150.00
			Subtotal Sales Tax Total Invoice Amount			150.00 150.00
Check/Credit Mer	no No:		Payment/Credit Applied			
			TOTAL			150.00

Overdue invoices are subject to late charges.

RINEY PALTER PLLC

CHECK REQUEST

To: Texas Pictorial	Date: 10-25-12
	Voucher:
	Amount: \$ 121-05
TRUST ACCOUNT BALANCE	
FILE NUMBER: £AGLO1-01	INVOICE NUMBER:
DESCRIPTION:	
Lewise of Aubpoena.	+Depot Metice on
sose martines	
ENTERED - TIME MATTERS	GENERAL LEDGER CODE
C/M#: Amount: Date:	General Ledger Amount Code
By: Conf#:	
Craig Stokley / Tune	
Requested By	Signing Director
Approved By	
Return to:	When Needed:
Mail to: goolead + Nail.	



2611 East Elm Street 78043 Laredo, Texas 724-7441 E-mail: depopro@stx.rr.com

Invoice Date:

Oct 24, 2012

Page:

1

Nathanial Martinez Riney Palter, PLLC 5949 Sherry Lane, Suite 1616 Dallas, TX 75225-8009

Nathanial Martinez Riney Palter, PLLC 5949 Sherry Lane, Suite 1616 Dallas, TX 75225-8009

MARTNAT-01			Net 30 C	11. Marie berram, Marie Marie Marie Saliberta		
	Sales Rec D. 1997				no Date	
GONZG		HILINGSHYE	US Mail	Litternit dien	A CONTRACTOR OF THE STATE OF TH	11/23/12
						Anomi kili
	PROSVC-CIT		Process Service for Citations: Joes	1	65.00	65.00
			Martinez, 3:12-CV-611-G			
1.00	PROSVC-WITI	FEE	Witness Fee	ŧ	40.00	40.00
20.60	TRICHG		Round trip mileage charge.	i	0.55	11.33
1.00	POST-01		Postage and Handling		0.45	0.45
			Subtotal			116.78
			Sales Tax			4.27
			Total Invoice Amount			121.05
Check/Credit Men	по No:		Payment/Credit Applied			
						學形式如2/05

Overdue invoices are subject to late charges.

TP Form 0001 Invoice II



RINEY PALTER P L L C ACCOUNTS PAYABLE 5949 SHERRY LN, STE 1616 DALLAS, TX 75225

ORIGINAL INVOICE

Special Delivery Service, Inc. 5470 L.B.J. Freeway Dallas, TX 75240 (214) 866-3200 • Fax (214) 866-3201

	INVOICE NUMBER	INVOICE DATE	INVOICE AMOUNT?
	407430	10/27/12	\$ 167.71
1	2144611200	THIS INVOICE IS	
Î	ACCOUNT:	IMMEDIATELY IUPON RECEIPT I	AMOUNT) (ENGLOSED) -

Detach at Perforation And Return This Top Portion With Your Payment

	▼ Detech at Perforation And Return This Top Portion With Your Payment ▼		
TRACKING #: CALLER REFERENCE	IDELIVERY (INFORMATION)	RECEIVED BY TIME DATE:	TOTAL AMOUNT
296-0530 A GAMINO EAGL01-01	FROM: SPECIAL DELIVERY PROCESS DEPT 5470 L B J FRWY DALLAS, TX 75240 TO: JOHN MCCONNELL 1454 HAMPTON RD GRAPEVINE, TX 76051 STANDARD EVENING DELIVERY = \$ 58.91 • WITNESS FEE = \$ 60.00 • ADVANCE FEE = \$ 14.00	J MCCONNELL 7:20 PM 10/24/12	\$ 132.91
297-0274 S YOUNG GTSL05-29 & 41	TO: USPS 8604 TURTLE CREEK DALLAS, TX 75225 FROM: RINEY PALTER P L L C 5949 SHERRY LN, STE 1616 DALLAS, TX 75225 STANDARD DAYTIME DELIVERY = \$ 17.40	P CLERK 11:24 AM 10/23/12	\$ 17.40
297-0275 S YOUNG GTSL05-29 & 41	FROM: USPS 8604 TURTLE CREEK DALLAS, TX 75225 TO: RINEY PALTER P L L C 5949 SHERRY LN, STE 1616 DALLAS, TX 75225 STANDARD DAYTIME DELIVERY = \$ 17.40	J PHIPPS 11:40 AM 10/23/12	\$ 17.40

١	# GXG3	T. INVOIGENUMBER	INVOICE AMOUNT	ACCOUNT BALANCE	CHECKOO. 4 EL	OATERAD	AMOUNTRAD
١	1	407430	167.71	272.37			

Thank you! We Appreciate Your Business. For Questions Regarding this Invoice, please Call Bill McNutt at (214) 866-3220 or Send an Email to Bill.McNutt@SpecialDelivery.com



Riney Palter, PLLC Accounts Payable 5949 Sherry Ln Ste 1616 Dallas, TX 75225-6532

INVOICE

Invoice Amount	
Invoice No.	18085-2120
Account No.	
Period Ending	3/25/2012
Page	
Unapplied-Credits	\$0.00

Remit Payments with this stub to: 10610 Newkirk St. Suite 206 Dallas, TX 75220 214-373-1999

Date	OrdTrkiD Caller/Ref#	Origin	Destination/POD	Base Charge	Additional Ch	arges	Total
3/12/12	1.032612 Alex Eagle / Heliman	Riney Paller, PLLC 5949 Sherry Ln Ste 1616 Dallas, TX 75225-6532 Pcs:1 Wi:0.00	Heilman Worldwide Logistics 16055 Space Center Bivd Houston, TX 77062-6251 pRISCILLA cARDENAS	\$90.00 Process Ser Car			\$90.00
3/20/12	176.032012 Alex HPC / Nichols	Riney Palter, PLLC 5949 Sherry Ln Ste 1616 Dallas, TX 75225-6532 Pcs:1 Wi:0.00	Dallas County District Court 600 Commerce St Dallas, TX 75202-4606 g gomez	\$11.00 4 Hour Deliv Car	Tot Surcharges: Fuel Surcharg	\$2.64 [2.64]	\$13.64
3/21/12	220.032112 Darlene La To MADI01-01	Riney Patter 5949 Sherry Lane, Suite 1616 Dallas, TX 75225 Pcs:1 Wi:0.00	Whitehall Real Estate 903 N. Bowser, Suite 170 Richardson, TX 75081 E OLMOS	*RT \$32.00 1 Hour Deliv Car	Online disc: Tot Surcharges: Fuel Surcharg	(\$0.96) \$7.68 [7.68]	\$38.72
3/22/12 HPC	73.032212 Alex / Nichols: DWQ	Riney Palter, PLLC 5949 Sherry Ln Ste 1616 Dallas, TX 75225-6532 Pcs:1 Wt:0.00	The Norman Law firm 108 E 5th St Rusk, TX 75785-1310 Name on File	\$101.00 Process Ser Car			\$101.00

	Current Charges		\$243.36
\$0.00	\$0.00 \$0.00		0
under 30	31-60 over 60		Fin. Chg.
	Account Balance		\$243.36

Terms: 30 Days

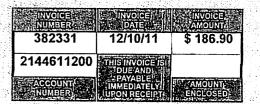


RINEY PALTER P L L C ACCOUNTS PAYABLE 5949 SHERRY LN, STE 1616 DALLAS, TX 75225

ORIGINAL INVOICE

Special Delivery Service, Inc. 5470 L.B.J. Freeway

Dallas, TX 75240 (214) 866-3200 • Fax (214) 866-3201



ダ Detach at Perforation And Return This Top Portion With Your Payment . マ

TRACKING # CALLER VREFERENCE	DELIVERY INFORMATION	TIME TIME LIDATE:	TOTAL AMOUNT
334-0356 J PHIPPS	PROCESS SERVING: HELLMAN WORLDWIDE HAS BEEN SUCCESSFULLY SERVED.	P CARDENAS	
EAGL01-01	AT: 16055 SPACE CENTER, STE 235 HOUSTON, TX 77082 BY OUT OF TOWN PROCESS SERVER STANDARD OUT OF TOWN SERVING = \$ 165.00	2:10 PM 12/01/11	\$ 165.00
341-0151	TO: JUDGE FITZWATER 1100 COMMERCE, RM 1528 DALLAS, TX 75242	BURTON	7 .55.55
J PHIPPS	FROM: RINEY PALTER P. L. C. 5949 SHERRY LN, STE 1616 DALLAS, TX 75225	10:00 AM	
MACK01-01	STANDARD DAYTIME DELIVERY = \$ 21.90	12/07/11	\$ 21.90
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PAGE TO VOICE NUMBER ON TO THE AUGUST PAGE OUT TO THE AUGUST PAGE OU

Thank you! We Appreciate Your Business. For Questions Regarding this Invoice, please Call Bill at (214) 866-3220 or Send an Email to Bill.McNutt@SpecialDelivery.com - TXDPS-PSB License A16470

RINEY PALTER PLLC CHECK REQUEST

To: Altonso De Lean	Date: 12-10-12
	Voucher:
	Amount: \$ 1294.00
TRUST ACCOUNT BALANCE	
FILE NUMBER: EAGLO(-01	INVOICE NUMBER:
DESCRIPTION:	
Court Reporter for de	eposition of Jose Martinez
on 11-16-12	
ENTERED – TIME MATTERS	GENERAL LEDGER CODE
C/M#:	General Ledger Amount Code
Amount: Date:	Code
By:	
Conf#:	
NLM /June	
Requested By	Signing Director
Approved By	
Return to:	When Needed:

Afonso De Leon, Certificd Shorthand and Stenomask Reporter 606 Idylwood Lane Laredo, Texas 78045 (956) 722-5677 Fax (956) 724-1696 ponchodeleon@sbcglobal.net

December 3, 2012

RINEY & PALTER
Mr. Nathanial Martinez
Attorney at Law
5954 Sherry Lane, Suite 1616
Dallas, Texas 75225

Deposition of Jose D. Martinez (Original and copy).....\$1,294.00

CAUSE NO. 3:12-CV-611-G, EAGLE SUSPENSIONS, INC. VERSUS HELMANN WORLDWIDE LOGISTICS, INC.

RINEY PALTER PLLC CHECK REQUEST

To: Constantin +assoc	Date: 11-29-12
	Voucher:
	Amount: \$ 640.30
TRUST ACCOUNT BALANCE	
FILE NUMBER: EAGLOI-01	INVOICE NUMBER;
DESCRIPTION:	
Deposition of John	McConnell on
11-15-12	
ENTERED – TIME MATTERS	GENERAL LEDGER CODE
C/M#: Amount:	General Ledger Amount Code
Date:	
By:	
Conf#	
WCS / June	
Requested By	Signing Director
Approved By	
Parimetra	When Needed
Return to:	_ When Needed:
Mail to: Alwan (mutantin	

INVOICE # 3744

CONSTANTIN & ASSOCIATES

Certified Court Reporters

P. O. BOX 170597

ARLINGTON, TX 76003-0597 PHONE: 817-919-0167 FACSIMILE: 817-483-9446

DATE: November 29, 2012

TO: MR. W. CRAIG STOKLEY

RE: No. 3:12-CV-00611-G Eagle Suspensions, Inc. Riney Palter, PLLC

5949 Sherry Lane, Suite 1616

Dallas, Texas 75225 Hellmann Worldwide Logistics, Inc.

For the oral deposition (including rough draft) of:

11/15/12 JOHN MCCONNELL \$640.30

Thank you for your business!

Susan M. Constantin

RETURN THIS PORTION WITH PAYMENT

DUE DATE: UPON RECEIPT AMOUNT DUE: \$640.30

CONSTANTIN & ASSOCIATES MAIL TO:

Certified Court Reporters

P. O. BOX 170597

ARLINGTON, TX 76003-0597

INVOICE # 3744

RINEY PALTER PLLC

CHECK REQUEST

To: U.S. Xegal Augport	Date: \2-4-\	2
- N.S. Wallex & willson	Voucher:	
	Amount: \$ \(\sum_{1} \)	1.65
TRUST ACCOUNT BALANCE		
FILE NUMBER: EAGLO1-01	INVOICE NUMBER	988
DESCRIPTION:		
Everett Beller Depo	sitions on 11,	/14/1a
ENTERED – TIME MATTERS	GENERAL LEDC	GER CODE
C/M#: Amount:	General Ledger Code	Amount
Date: By:		
Conf#;		
wcs/Jane		
Requested By	Signing	g Director
Approved By		
Return to:	When Needed	•
Mail to: US flegal Aupport		

INVOICE

U.S. Legal Support 5910 N. Central Expressway Suite 100 Dallas, TX 75206 Phone:214-741-6001 Fax:214-741-6824

> **Craig Stokley** Riney Palter, PLLC 5949 Sherry Lane **Suite 1616** Dallas, TX 75225-8009

Invoice No.	Invoice Date	Job No.
91369988	11/29/2012	134568
Job Date	Case	No.
11/14/2012	3:12-CV-611-G	
	Case Name	
Eagle Suspensions Inc.	s, Inc. v. Hellmann World	dwide Logistics,
	Payment Terms	
Due upon receipt		

1 CERTIFIED COPY OF TRANSCRIPT OF:		
Everett Zeller		263.23
1 CERTIFIED COPY OF TRANSCRIPT OF:		
Everett Zeller-Eagle Suspensions		232.29
1 CERTIFIED COPY OF TRANSCRIPT OF:		
Everett Zeller-Dallas Spring		252.13
	TOTAL DUE >>>	\$747.65
	AFTER 1/13/2013 PAY	\$822.42
Thank you. We appreciate your business. Please call us @ 214-741-6001 X 4341 if yo have any billing questions.	u	
Please contact us immediately with questions or corrections regai No adjustments or refunds will be made after 120 days from		

Tax ID: 76-0523238 Phone: 214-461-1200 Fax:214-461-1210

Please detach bottom portion and return with payment.

Job No.

Case No.

Craig Stokley Riney Palter, PLLC 5949 Sherry Lane **Suite 1616**

Dallas, TX 75225-8009

Remit To: U.S. Legal Support

P.O. Box 952172 Dallas, TX 75395-2172

Texas Records & Reporting

Invoice No. : 91369988 Involce Date : 11/29/2012

Total Due : \$ 747.65 AFTER 1/13/2013 PAY \$822.42

: 134568

: 3:12-CV-611-G

Logistics, Inc.

PAYMENT WITH C	REDIT CARD	AMEX	<u>M</u>
Cardholder's Name:			
Card Number:			
Exp. Date:	Phon	e#:	
Billing Address:			
Zip:	Card Security Co	ode:	
Amount to Charge:			
Cardholder's Signatu	re:		

Case Name : Eagle Suspensions, Inc. v. Hellmann Worldwide

BU ID

:2-DAL

P's Appx. 128

RINEY PALTER PLLC CHECK REQUEST

To: US Legal Support	Date:	20-12
	Voucher:	
	Amount: \$	2502 503,21
TRUST ACCOUNT BALANCE		
FILE NUMBER: EAGL 01-01	INVOICE NUMBER	?:91319295
DESCRIPTION:		
2 Depositions of Shi	rley Polinsor	on 1/1/12
ENTERED – TIME MATTERS	GENERAL LEDO	GER CODE
C/M#:	General Ledger Code	Amount
Amount: Date:	Code	
By: Conf#:		
wes /June		
Requested By	Signin	g Director
Approved By		
Return to:	When Needed	: <u> </u>
Mail to: USLegal Support		

INVOICE

U.S. Legal Support 5910 N. Central Expressway Suite 100 Dallas, TX 75206 Phone:214-741-6801 Fax:214-741-6824

> Craig Stokley Riney Palter, PLLC 5949 Sherry Lane Suite 1616 Dailas, TX 75225-8009

Invoice No.	Involce Date	Job No.		
91369285	11/14/2012	134534		
Job Date	Case	Case No.		
11/7/2012	3:12-CV-611-G	3:12-CV-611-G		
	Case Name			
Eagle Suspensions Inc.	, Inc. v. Hellmann Worl	dwide Logistics,		
	Payment Terms			
Due upon receipt				

1 CERTIFIED COPY OF TRANSCRIPT OF:		
Shirley Robinson (Dallas Spring Corp.)		236.08
1 CERTIFIED COPY OF TRANSCRIPT OF:	· -	
Shirley Robinson*Fact Witness		267.13
	TOTAL DUE >>>	\$503.21
	AFTER 12/29/2012 PAY	\$553.53
Thank you. We appreciate your business. Please call us @ 214-741-6001 X 4341 if you have any billing questions.		
Please contact us immediately with questions or corrections regardin No adjustments or refunds will be made after 120 days from da	g billing or payment. te of payments.	

Tax ID: 76-0523238 Phone: 214-461-1200 Fax:214-461-1210

Please detach bottom portion and return with payment.

Craig Stokley Riney Palter, PLLC 5949 Sherry Lane Suite 1616

Dallas, TX 75225-8009

Remit To: U.S. Legal Support
Texas Records & Reporting
P.O. Box 952172
Dallas, TX 75395-2172

Job No. : 134534 BU ID :2-DAL

Case No. : 3:12-CV-611-G

Case Name : Eagle Suspensions, Inc. v. Hellmann Worldwide

Logistics, Inc.

Total Due : \$ 503.21AFTER 12/29/2012 PAY \$553.53

PAYMENT WITH O	REDIT CARD	AMEX	VISA
Cardholder's Name:			
Card Number:			
Exp. Date:	Phon	e#:	
Billing Address:			 <u>.</u>
Zip:	Card Security Co	ode:	
Amount to Charge:			
Cardholder's Signatu	ıre:		

RINEY PALTER PLLC

CHECK REQUEST

To: Word Sor Word	Date: 8-27-12)
	Voucher:	
	Amount: \$ 214	'e.40
TRUST ACCOUNT BALANCE	· · · · · · · · · · · · · · · · · · ·	September State Commence of the State Commen
FILE NUMBER: EAGLO1-01	INVOICE NUMBER	E:
DESCRIPTION:		
8812 Deposition of A	Thin Russell	
ENTERED – TIME MATTERS C/M#: Amount: Date: By: Conf#:	GENERAL LEDO General Ledger Code	GER CODE Amount
Oraig Stokley / June Requested By	Signin	g Director
Approved By		
Return to:	When Needed	
Mail to: Gail Spurgeon		

Gail Spurgeon
Word for Word

P.O. Box 181298 Dallas, Texas 75218-8298 Phone: 214.887.6300

Fax: 214.887.6303

Invoice

DATE

INVOICE #

8/24/2012

3029

BILL TO:

RINEY PALTER W. CRAIG STOKELY **5949 SHERRY LANE SUITE 1616** DALLAS TX 75225

DESCRIPTION

AMOUNT

CAUSE NO. 3:12-CV-00611-G **EAGLE SUSPENSIONS, INC.** HELLMANN WORLDWIDE LOGISTICS, INC.

DEPOSITION OF (copy): 08/08/2012 JOHN RUSSELL

216.40

THANK YOU FOR YOUR BUSINESS!!! INVOICE PAYABLE UPON RECEIPT.

TOTAL

\$216.40



Xact Data Discovery - Downtown Dallas, T 214-303-0100

INVOICE

Invoice Number: 30-02093

Invoice Date: 2/5/2013

REMIT PAYMENT TO: Xcellence, Inc.

Worksource #163 PO Box 414378

Customer ID

30PSSW

Kansas City, MO 64141

Page: 1

Bill

Terms

To: Palter Stokley Sims Wright PLLC Nathanial L. Martinez 1933 E. Levee Street Dallas, TX 75207

Net 30 Days

Ship

To: Palter Stokley Sims Wright PLLC

Nathanial L. Martinez 1933 E. Levee Street Dallas, TX 75207 United States

Ship Via
Ship Agent
Ship Date 2/5/2013
Due Date 3/7/2013

United States

Contact Nathanial L. Martinez P.O. Number EAGL01-01

Case No. EAGL01-01 Job No. DTDA001924 SalesPerson Joseph Wieczorek

Item/Descrip	otion	Quantity Unit	Price per Unit	Total Price
IMAGE7	B/W Blowbacks	2,694 Each Item	09.	242.46
SUPP2	Supplies Binder 3-ring 2"	1 Each Item	10.00	10.00
SUPP3	Supplies Binder 3-ring 3"	1 Each Item	15.00	15.00
SUPP3	Supplies Binder 3-ring 4"	3 Each Item	20.00	60.00
SUPP6	Supplies Index Tabs	236 Each Item	.35	82.60

Fed. Tax ID#: 43-1685216	Amount Subject to	Amount Exempt	Subtotal:	410.06
	Sales Tax	from Sales Tax	Invoice Discount:	0.00
	410.06	0.00	Total Sales Tax:	33.83
			Total·	443.80

Your signature below, or email approval, is an agreement that the above described work has been authorized and received. Your signature also acknowledges that the firm identified in the "Bill To" portion of this invoice is responsible for payment within 30 days of receipt. Interest at the rate of 1.5% per month may be charged on invoices not paid within 30 days. Customer agrees to pay all legal fees in the collection of past due accounts.

Received and Approved By:	Date:	

Kansas City, MO 64141



Xact Data Discovery - Downtown Dallas, T 214-303-0100

INVOICE

Invoice Number: 30-02015

Invoice Date: 1/11/2013

Page: 1

REMIT PAYMENT TO: Xcellence, Inc.

Worksource #163 Customer ID 30PSSW PO Box 414378

To: Palter Stokley Sims Wright PLLC Nathanial L. Martinez

> 2201 Wolf St Apt. 3205 Dallas, TX 75201 United States

Ship Via Ship Agent

Bill

 Ship Date
 1/11/2013

 Due Date
 2/10/2013

 Terms
 Net 30 Days

Ship

To: Palter Stokley Sims Wright PLLC

Nathanial L. Martinez

2201 Wolf St Apt. 3205 Dallas, TX 75201 United States

Contact P.O. Number

Nathanial L. Martinez
Docs from Co Database

Case No.

Job No. DTDA001852 SalesPerson Joseph Wieczorek

Item/Description	n 	Quantity Unit	Price per Unit	Total Price
IMAGE8	B/W Blowbacks w/ slip sheets	2,272 Each Item	.08	181.76

Fed. Tax ID#: 43-1685216 Amount Subject to Amount Exempt Subtotal: 181.76
Sales Tax from Sales Tax Invoice Discount: 0.00
181.76 0.00 Total Sales Tax: 15.00

Total: 196.76

Your signature below, or email approval, is an agreement that the above described work has been authorized and received. Your signature also acknowledges that the firm identified in the "Bill To" portion of this invoice is responsible for payment within 30 days of receipt. Interest at the rate of 1.5% per month may be charged on invoices not paid within 30 days. Customer agrees to pay all legal fees in the collection of past due accounts.

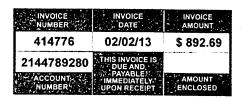
Received and Approved By:		Date:	



PALTER STOKLEY SIMS WRIGHT ATTN: JOHN PALTER 1933 LEVEE 2712 AMHERST DALLAS, TX 75225

ORIGINAL INVOICE

Special Delivery Service, Inc. 5470 L.B.J. Freeway Dallas, TX 75240 (214) 866-3200 • Fax (214) 866-3201



▼ Detach at Perforation And Return This Top Portion With Your Payment ▼

,	▼ Detach at Perforation And Return This Top Portion With Your Payment ▼		
TRACKING # CALLER REFERENCE	DELIVERY INFORMATION	RECEIVED BY TIME DATE	TOTAL AMOUNT
031-0281 K BURKHART EAGLE	TO: U S DISTRICT COURT - DALLAS 1100 COMMERCE ST, RM 1452 DALLAS, TX 75242 FROM: PALTER STOKLEY SIMS WRIGHT 1933 LEVEE DALLAS, TX 75207 STANDARD DAYTIME DELIVERY = \$ 22.47	T ALLEN 11:26 AM 01/31/13	\$ 22.47
028-0369 A GAMINO EAGLE/HELLMA	TO: JUDGE JOE FISH 1100 COMMERCE DALLAS, TX 75242 FROM: PALTER STOKLEY SIMS WRIGHT 1933 LEVEE DALLAS, TX 75207 STANDARD DAYTIME DELIVERY = \$ 22.47	J ROGERS 1:45 PM 01/28/13	\$ 22.47
031-0205 A GAMINO EAGLE/HELLMA	PROCESS SERVING: DAVID KANG HAS BEEN SUCCESSFULLY SERVED. AT: 1200 MINTERS CHAPEL RD, STE 300 GRAPEVINE, TX 76051 BY SERVER JOE CLEWIS THREE HOUR SERVING = \$ 169.50 • WITNESS FEE = \$ 65.00 • ADVANCE FEE = \$ 14.75	D KANG 10:54 AM 01/31/13	\$ 249.25
025-0651 A GAMINO EAGLE/HELLMA	PROCESS SERVING: JOHN MCCONNELL AT: 1454 HAMPTON RD GRAPEVINE, TX 76051 BY SERVER JOE CLEWIS THREE HOUR SERVING = \$ 169.50 • OUT OF COUNTY = \$ 50.00 • WITNESS FEE = \$ 65.00 ADVANCE FEE = \$ 14.75	J MCCONNELL 8:59 AM 01/28/13	\$ 299.25
025-0650 A GAMINO EAGLE/HILLMA	PROCESS SERVING: JOHN RUSSELL HAS BEEN SUCCESSFULLY SERVED. AT: 801 HANOVER DRIVE, STE 250 GRAPEVINE, TX 76051 BY SERVER JOE CLEWIS THREE HOUR SERVING = \$ 169.50 • OUT OF COUNTY = \$ 50.00 • WITNESS FEE = \$ 65.00 ADVANCE FEE = \$ 14.75	J RUSSELL 8:41 AM 01/30/13	\$ 299.25
		/ C	المعيد
		V	QB

PAGE INVOICE NUMBER INVOICE AMOUNT ACCOUNT DAVANCE CHECK TO CALE PAID ANOUNT PAID 1 414776 892.69 1,191.93

Thank you! We Appreciate Your Business. For Questions Regarding this Invoice, please Call Bill McNutt at (214) 866-3220 or Send an Email to Bill.McNutt@SpecialDelivery.com

SPECIAL DELIVERY SERVICE, INC. • 5470 L.B.J. FREEWAY • DALLAS, TX 75240 • (214) 866-3200 • FEDERAL ID NO. 75-2811091

FE THE SECTION

CALLER REFERENCE	3C 0.12-0V-0	/0011-O Duce	ECIVERY SINFORMA	TON TAGE	139 of 178	PRECEIVED BYO TIME DATE	TOTAL AMOUNT
024-0221 K BURKHART EAGLE	FROM: RINEY		RIGHT 1933 LEVEE DAL RY LN, STE 1616 DALLA 24.74		V.	K BURKHART 10:52 AM 01/24/13	\$ 24.74
022-0597 D LATOUR KJS	TO: PALTE		RY, STE 1616 DALLAS, 1 RIGHT 1933 LEVEE DAL 30.93			D LATOUR 4:10 PM 01/22/13	\$ 30.93
021-0133 BURKHART GIORDANO	<u>TO:</u> 236TH		ADDRESS 1933 LEVEE (1 W BELKNAP, 7TH FL (61.06		√	S BYRD 8:05 AM 01/22/13	\$ 61.06
	OICE NUMBÉR	INVOICE AMOUNT	ACCOUNT BALANCE;	CHECK NO	DATE PAID	AMOUN	T _r PAID T
PAGE: INV		Francisco (1924) (1944)	299.24			ole medicati	

Case 3:12-cv-00611-G Document 116 Filed 04/24/13 Page 140 of 178 PageID 2403



We deliver peace of mind

Riney Palter John T Palter 5949 Sherry Lane 1616 Dallas, TX 75225

INVOIC	E
Total Due	\$2.49
Invoice No.	RPX1-877
Acct. No.	RPX1
Period Ending	9/30/2012
Page	1
Amount Paid	

Remit Payments with this stub to: P.O. Box 59972 Dallas, TX 75229 214-351-5777

	Cur	\$28.37	
\$0.00	\$0.00	\$0.00	C
under 30	31-60	over 60	Fin. Chg.
		Total Due	\$28.37

Date	OrdTrkID Caller/Ref#	Orlgin	Destination/POD	Base Charge	Additional Ch	arges	Total
9/24/12	370.092412	Riney Patter PLLC	Federal Building	\$12.15	Tot Surcharges:	\$0.97	\$13.12
	June	5949 Sherry Lane 1616	1100 Commerce	4 Hour	Fuel Surcharg	[0.97]	
		Dallas, TX 75225	Dallas, TX 75201	Car or Any			
		Pcs:0 Wt:0.00	A Aguillar 12:55				
9/27/12	501.092712	Riney Palter PLLC	Federal Building	\$14.12	Tot Surcharges:	\$1.13	\$15.25
	June	5949 Sherry Lane 1616	1100 Commerce 1404	3 Hour	Fuel Surcharg	[1.13]	
		Dallas, TX 75225	Dallas, TX 75201	Car or Any			
		Pcs:0 Wt:0.00	ELENOR P 12:45	_			

Eaglo1.01

Invoice is payable upon receipt



RINEY PALTER P L L C ACCOUNTS PAYABLE 5949 SHERRY LN, STE 1616 DALLAS, TX 75225

ORIGINAL INVOICE

Special Delivery Service, Inc.

5470 L.B.J. Freeway Dallas, TX:75240 (214) 866-3200 • Fax (214) 866-3201

INVOICE NUMBER	INVOICE() #	INVOICE, 4
403551	09/08/12	\$ 384.61
2144611200	THIS INVOICE IS	
ACCOUNT'	JPAYABLEEUR JIMMEDIATELY JUPON RECEIPT	AMOUNT ENCLOSED

V. Detach at Perforation And Return This Top Portion With Your Payment

	V. Detach at Perforation And Return This top Portion With Your Payment. V		
TRACKING #1 CALLER	DELIVERY INFORMATION	IRECEIVED BY. TIME DATE:	TOTAL AMOUNT
248-0223 A GAMINO B ARG0101	TO: SPECIAL DELIVERY PROCESS DEPT 5470 L B J FRWY, STE 100 DALLAS, TX 75240 FROM: RINEY PALTER P L L C 5949 SHERRY LN, STE 1616 DALLAS, TX 75225 STANDARD DAYTIME DELIVERY = \$ 11.04	T C 11:43 AM 09/04/12	\$ 11.04
248-0143 J PHIPPS EAGL01-01	TO: JUDGE FISH 1100 COMMERCE, RM 1404 DALLAS, TX 75242 FROM: RINEY PALTER P L L C 5949 SHERRY LN, STE 1616 DALLAS, TX 75225 STANDARD DAYTIME DELIVERY = \$ 21.42	E PIEVONI 9:45 AM 09/04/12	\$ 21.42
248-0124 S YOUNG GTSL04-05	TO: HILL COUNTY COURT 1 COURTHOUSE SQUARE HILLSBORO, TX 76645 FROM: RINEY PALTER P L L C 5949 SHERRY LN, STE 1616 DALLAS, TX 75225 OUT OF METROPLEX = \$ 256.45 • ADVANCE FEE = \$ 5.60 • COPY EXPENSE = \$ 4.00	CLERK 4:40 PM 09/04/12	\$ 266.05
250-0411 J PHIPPS MACK01-01	TO: JOHN NORRIS 3811 TURTLE CREEK, STE 400 DALLAS, TX 75219 FROM: RINEY PALTER P L L C 5949 SHERRY LN, STE 1616 DALLAS, TX 75225 STANDARD DAYTIME DELIVERY = \$ 21.42	A WYTHINGTON 3:15 PM 09/06/12	\$ 21.42
251-0470 S YOUNG MILC01-02	TO: TARRANT COUNTY DISTRICT CLERK 401 W BELKNAP ST. FT WORTH, TX 76196 FROM: RINEY PALTER P L L C 5949 SHERRY LN, STE 1616 DALLAS, TX 75225 STANDARD DAYTIME DELIVERY = \$ 64.68	Y GARZA 3:06 PM 09/07/12	\$ 64.68

I	EXGB.	INVOICEINUMBER	INVOICE AMOUNT	ACCOUNTIBALANCE	G113633(0)	DATERAID	AMOUNT FAID
	1	403551	384.61	895.10			

Thank you! We Appreciate Your Business. For Questions Regarding this Invoice, please Call Bill McNutt at (214) 866-3220 or Send an Email to Bill.McNutt@SpecialDelivery.com

Case 3:12-cv-00611-G Document 116 Filed 04/24/13 Page 142 of 178 PageID 2405



Riney Palter, PLLC Accounts Payable 5949 Sherry Ln

INVOICE

Invoice Amount	\$33.06
Invoice No.	18085-2092
Account No.	18085
Period Ending	3/4/2012
Page	1
Unapplied-Credits	\$0.00

Remit Payments with this stub to:
10610 Newkirk St.
Suite 206
Dallas, TX 75220
214-373-1999

-cut and return with payment-

Dallas, TX 75225-6532

Ste 1616

Date	OrdTrkID Caller/Ref#	Origin	Destination/POD	Base Charge	Additional Cha	rges	Total
2/29/12	115.022912 Alex	Riney Patter, PLLC 5949 Sherry Ln Ste 1616 Dallas, TX 75225-6532 Pcs:1 Wt:0.00	Northern District of Texas 1100 Commerce St Dallas, TX 75242-1001 m taylor	\$11.00 4 Hour Deliv Car	Tot Surcharges: Fuel Surcharg	\$2.53 [2.53]	\$13.53
3/1/12	63.030112 stephanie Personal	Dallas police dept 1400 S Lamar St Dallas, TX 75215-1801 Pcs:1 Wt:0.00	Riney Palter, PLLC 5949 Sherry Ln Ste 1616 Dallas, TX 75225-6532 CANDA	\$11.00 4 Hour Deliv- Car	REIMBURSMENT: REPORT FEE: Tot Surcharges: Fuel Surcharg	\$6.00 \$0.00 \$2.53 [2.53]	\$19.53

1	Сип	\$33.06		
\$185.00			0	
under 30			Fin. Chg.	
			\$218.06	

Terms: 30 Days



RINEY PALTER P L L C ACCOUNTS PAYABLE 5949 SHERRY LN, STE 1616 DALLAS, TX 75225

ORIGINAL INVOICE

Special Delivery Service, Inc.

5470 L.B.J. Freeway Dallas, TX 75240 (214) 866-3200 • Fax (214) 866-3201

	INVOICE NUMBER	INVOICES DATE	INVOICE AMOUNT
	382889	12/17/11	\$ 814.01
-	2144611200	THIS INVOICE IS	
	ACCOUNT NUMBER	PAYABLE II I I IMMEDIATELY WUPON RECEIRT	YAMOUNT: S ENCLOSED

♥ Detach at Perforation And Return This Top Portion With Your Payment ♥

	TRACKING # CALLER REFERENCE	DELIVERY INFORMATION	RECEIVEDIBY DATE	TOTAL TOUNT
	334-0392 / J PHIPPS EAGL01-01 /	FROM: SPECIAL DELIVERY PROCESS DEPT 5470 L B J FRWY DALLAS, TX 75240 TO: HOUSTON PROCESS OFFICE HOUSTON, TX 77098	DELIVERED 7:57 AM 12/01/11	\$ 49.00
	350-0573 √ A GAMINO FIRM -ESTATE	FROM: PROBATE COURT 3 509 MAIN ST, STE 209 DALLAS, TX 75202 TO: RINEY PALTER P.L. C 5949 SHERRY LN, STE 1616 DALLAS, TX 75225 STANDARD DAYTIME DELIVERY = \$ 21.90 • ADVANCE FEE = \$ 53.00 • COPY EXPENSE = \$ 320.00	J CREWSE 5:00 PM 12/16/11	\$ 394.90
	347-0161 / S YOUNG STEF01-03	FROM: CITATIONS DESK - COUNTY 600 COMMERCE, 1ST FL DALLAS, TX 75202 TO: SPECIAL DELIVERY PROCESS DEPT 5470 L B J FRWY, STE 100 DALLAS, TX 75240 STANDARD DAYTIME DELIVERY = \$ 13.57	TOM 10:22 AM 12/13/11	\$ 13.57
) 	347-0255 S YOUNG √ STEF01-03	PROCESS SERVING: BRADLEY D POWELL IS NOT AT THIS ADDRESS. AT: 6505 BANDERA AVE, APT 2D DALLAS, TX 75225 BY SERVER ADIL TADLI STANDARD SERVING = \$ 96.52	S T T F SERVICE 11:15 AM 12/14/11	\$ 96.52
1000	347-0257 S YOUNG STEF01-03	PROCESS SERVING: MELINDA L POWELL IS NOT AT THIS ADDRESS. AT: 6505 BANDERA AVE, APT 2D DALLAS, TX 75225 BY SERVER ADIL TADLI ADDITIONAL PAPER = \$ 45.00	S T T F SERVICE 11:30 AM 12/14/11	\$ 45.00
	348-0386 S YOUNG STEF01-03	PROCESS SERVING: BRADLEY D POWELL - 2 HAS BEEN SUCCESSFULLY SERVED. AT: 4911 CRANDBROOK DR. E. COLLEYVILLE, TX 76034 BY SERVER ADAM BRIDGEWATER STANDARD SERVING = \$ 96.52 • OUT OF COUNTY = \$ 20.00	B D POWELL 6:10 PM 12/15/11	\$ 116.52
	348-0388 S YOUNG STEF01-03	PROCESS SERVING: MELINDA L. POWELL - 2 HAS BEEN SUCCESSFULLY SERVED. AT: 4911 CRANDBROOK DR. E. COLLEYVILLE, TX 76034 BY SERVER ADAM BRIDGEWATER ADDITIONAL PAPER = \$ 45.00	M L POWELL 6:10 PM 12/15/11	\$ 45.00
	350-0276 J S CANADA THEL0101	TO: DALLAS DISTRICT CLERK 600 COMMERCE DALLAS, TX 75202 FROM: RINEY PALTER P L L C 5949 SHERRY LN, STE 1616 DALLAS, TX 75225 STANDARD DAYTIME DELIVERY = \$ 21.90 • WAITING TIME (20 MIN) = \$ 9.70	S ANDERENY 11:35 AM 12/16/11	\$ 31.60
	350-0279 S CANADA √ THEL0101	FROM: DALLAS DISTRICT CLERK 600 COMMERCE DALLAS, TX 75202 TO: RINEY PALTER P L L C 5949 SHERRY LN, STE 1616 DALLAS, TX 75225 STANDARD DAYTIME DELIVERY = \$ 21.90	A MACKAY 1:05 PM 12/16/11	\$ 21.90
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1	382889	814.01	814.01			

Thank you! We Appreciate Your Business. For Questions Regarding this Invoice, please Call Bill at (214) 866-3220 or Send an Email to Bill.McNutt@SpecialDelivery.com - TXDPS-PSB License A16470



RINEY PALTER P L L C **ACCOUNTS PAYABLE 5949 SHERRY LN, STE 1616 DALLAS, TX 75225**

ORIGINAL INVOICE

Special Delivery Service, Inc. 5470 L.B.J. Freeway Dallas, TX 75240 (214) 866-3200 · Fax (214) 866-3201



▼ Detach at Perforation And Return This Top Portion With Your Payment ▼		1 1 V
ADELIVERY INFORMATION	PRECEIVED BY	TOTAL AMOUNT
TO: SPECIAL DELIVERY PROCESS DEPT 5470 L B J FRWY DALLAS, TX 75240 FROM: RINEY PALTER P L L C 5949 SHERRY LN, STE 1616 DALLAS, TX 75225 STANDARD DAYTIME DELIVERY = \$ 10.94	M ESQUIVEL 10:45 AM 11/30/11	\$ 10.94
TO: WHITEHALL REAL ESTATE 903 N BOWSER, STE 170 RICHARDSON, TX 75081 FROM: RINEY PALTER P L L C 5949 SHERRY LN, STE 1616 DALLAS, TX 75225 STANDARD DAYTIME DELIVERY = \$ 23.37	R GREENBERG 1:55 PM 11/29/11	\$ 23.37
FROM: WHITEHALL REAL ESTATE 903 N BOWSER, STE 170 RICHARDSON, TX 75081 TO: RINEY PALTER P L L C 5949 SHERRY LN, STE 1616 DALLAS, TX 75225 STANDARD DAYTIME DELIVERY = \$ 23.37	D LATOUR 2:17 PM 11/29/11	\$ 23.37
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	DELIVERY INFORMATION SPECIAL DELIVERY PROCESS DEPT 5470 L B J FRWY DALLAS, TX 75240 FROM: RINEY PALTER P L L C 5949 SHERRY LN, STE 1616 DALLAS, TX 75225 STANDARD DAYTIME DELIVERY = \$ 10.94 TO: WHITEHALL REAL ESTATE 903 N BOWSER, STE 170 RICHARDSON, TX 75081 FROM: RINEY PALTER P L L C 5949 SHERRY LN, STE 1616 DALLAS, TX 75225 STANDARD DAYTIME DELIVERY = \$ 23.37 FROM: WHITEHALL REAL ESTATE 903 N BOWSER, STE 170 RICHARDSON, TX 75081 TO: RINEY PALTER P L L C 5949 SHERRY LN, STE 1616 DALLAS, TX 75225	TO: SPECIAL DELIVERY PROCESS DEPT 5470 L B J FRWY DALLAS, TX 75240 M ESQUIVEL FROM: RINEY PALTER P L L C 5949 SHERRY LN, STE 1616 DALLAS, TX 75225 TO: WHITEHALL REAL ESTATE 903 N BOWSER, STE 170 RICHARDSON, TX 75081 FROM: RINEY PALTER P L L C 5949 SHERRY LN, STE 1616 DALLAS, TX 75225 STANDARD DAYTIME DELIVERY = \$ 23.37 FROM: WHITEHALL REAL ESTATE 903 N BOWSER, STE 170 RICHARDSON, TX 75081 FROM: WHITEHALL REAL ESTATE 903 N BOWSER, STE 170 RICHARDSON, TX 75081 FROM: WHITEHALL REAL ESTATE 903 N BOWSER, STE 170 RICHARDSON, TX 75081 D LATOUR TO: RINEY PALTER P L L C 5949 SHERRY LN, STE 1616 DALLAS, TX 75225 D LATOUR TO: RINEY PALTER P L L C 5949 SHERRY LN, STE 1616 DALLAS, TX 75225

PAGE	F# INVOIGE NUMBER	INVOICE AMOUNT	ACCOUNTBALANCE	GHEGKINO.	DATERAD	AMOUNT PAID
1	381789	57.68	57.68			
<u> </u>	1					

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Case 3:12-cv-00611-G Document 116 Filed 04/24/13 Page 145 of 178 PageID 2408 My Profile Support Locations 🖭 English · Search Subi Fed Ex FedEx Office ® Ship Track Manage Learn FedEx Billing Online Printer-friendly (a)Logout (?) 0.00 **Account Summary** Search/Download My Options Message Center Tracking ID Details **Back** Tracking ID Summary 3 Help ⊟ Hide Billing Information Messages Package sent from: 75208 zip code Tracking ID no. <Pre> 794594714933 ▼ Next> Fuel Surcharge FedEx has applied a fuel surcharg Read More... Invoice no. 4-229-95060 Account no 3520-7791-7 Dill date . 01/24/2013 Tuwi Biiitu " à i b.45 Tracking ID Balance due \$0.00 Status View Invoice History View signature proof of delivery

ender Information		Recipient Information		
ohn Palter 6949 Sherry Lane - Suite 1616 OALLAS TX 75225		Thomas R. Nork LEGGE FARROW KIMMITT McGRATH 5151 San Felipe		
US		HOUSTON TX 77056 US		
hipment Details		Charges		
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Customer reference no. Department no. Reference #2 Reference #3	Eagle			
Proof of Delivery				
Delivery date Service area code Signed by View signature proof of delivery	01/25/201309:02 A1 B.BBALOWSKY			

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Back

Customer Focus New Customer Center Small Business Center Service Guide Customer Support My FedEx Office Rewards Featured Services FedEx SameDay FedEx Home Delivery Healthcare Solutions Online Retail Solutions Packaging Services Ancillary Clearance Services Companies FedEx Express FedEx Ground FedEx Office FedEx Freight FedEx Custom Critical FedEx Trade Networks FedEx SupplyChain

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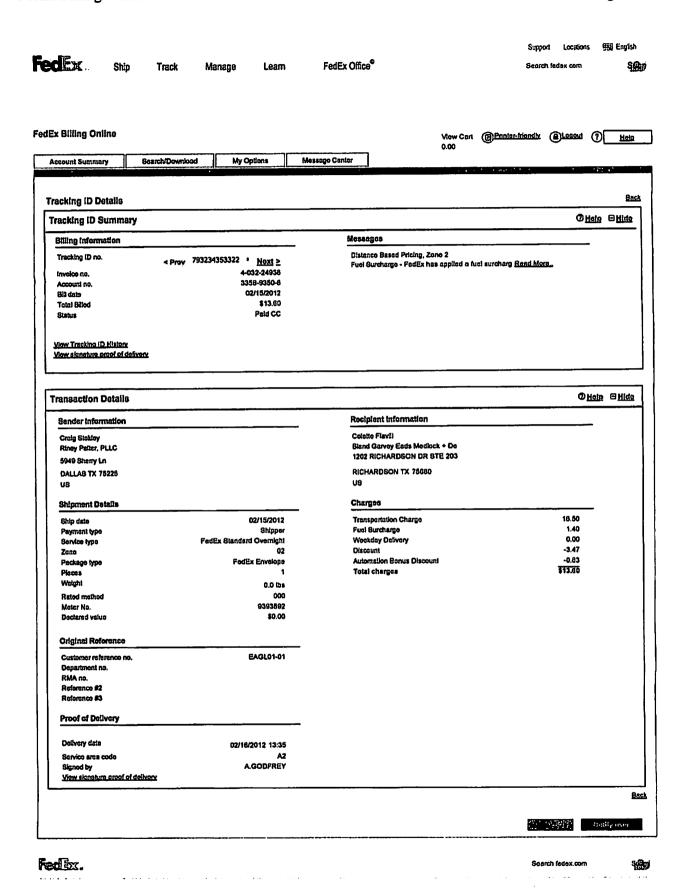
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Craig Stakley			us R. Nark, Esq	·	
Rinoy Paker, PLLC			os Ourbar, LLP ,OUISIANA ST STE 2600		
5949 Sherry Ln DALLAS TX 75225 US		HOU US	STON TX 77002		
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Ship date	01/27/2012	Tran	sportation Chargo	19.75	
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Doctared value	\$0.00				
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Department no. RMA no.					
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Service area code	A1				
Signed by View signature proof of delivery	M.CORDOVA				
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Corporations Section P.O.Box 13697 Austin, Texas 78711-3697



Hope Andrade Secretary of State

Office of the Secretary of State Packing Slip

December 5, 2011 Page 1 of 1

Attn: Riney Palter PLLC Riney Palter PLLC 5949 Sherry Lane Suite 1616 Dallas, TX 75225

Batch Number: 39932964

Batch Date: 12-05-2011

Client ID: 141908821

Return Method: Email

Client Reference: EAGL01-01

Document Number	Document Detail	Number / Name	Page Count	Fee
399329640002	Find by Registered Agent	Hellmann Worldwide Log	gistics,	\$1.00
399329640003	Find	Inc. hellmann worldwide logis	tics, inc.	\$1.00
			Total Fees:	\$2.00

Total Amount Charged to Client Account:

\$2.00

(Applies to documents or orders where Client Account is the payment method)

Note: This is not a bill. Please do not send any payments until the monthly statement is received. Any amount credited to Client Account may be refunded upon request. Refunds (if applicable) will be processed within 10 business days. Acknowledgement of Filing Document(s) (if present) is attached.

User ID: WEBSUBSCRIBER

Phone: (512) 463-5555

Come visit us on the Internet @ http://www.sos.state.tx.us/ FAX: (512) 463-5709 Dial: 7-1-1 for Relay Services

Case 3:12-cv-00611-G Document 116 Filed 04/24/13 Page 150 of 178 PageID 2413

Corporations Section P.O.Box 13697 Austin, Texas 78711-3697



Hope Andrade Secretary of State

Office of the Secretary of State Packing Slip

November 2, 2011 Page 1 of 1

Attn: Riney Palter PLLC Riney Palter PLLC 5949 Sherry Lane Suite 1616 Dallas, TX 75225

Batch Number: 39510350

Batch Date: 11-02-2011

Client ID: 141908821

Return Method: Email

Client Reference: EAGL01-01

Document Number	Document Detail	Number / Name	Page Count	Fee
395103500002	Find by Registered Agent	Hellman Worldwide Logistics, Inc.		\$1.00
395103500003	Find by Registered Agent	Hellmann Worldwide Logistics, Inc.		\$1.00
		Total l	₹ees:	<u>\$2.00</u>

Total Amount Charged to Client Account:

\$2.00

(Applies to documents or orders where Client Account is the payment method)

Note: This is not a bill. Please do not send any payments until the monthly statement is received. Any amount credited to Client Account may be refunded upon request. Refunds (if applicable) will be processed within 10 business days. Acknowledgement of Filing Document(s) (if present) is attached.

User ID: WEBSUBSCRIBER

Phone: (512) 463-5555

Come visit us on the Internet @ http://www.sos.state.tx.us/
FAX: (512) 463-5709 Dial: 7-1-1 for Relay Services

P's Appx. 147

Case 3:12-cv-00611-G Document 116 Filed 04/24/13 Page 151 of 178 PageID 2414

Corporations Section P.O.Box 13697 Austin, Texas 78711-3697



Hope Andrade Secretary of State

Office of the Secretary of State Packing Slip

October 12, 2011 Page 1 of 1

Attn: Riney Palter PLLC Riney Palter PLLC 5949 Sherry Lane Suite 1616 Dallas, TX 75225

_Batch Number: 39248362

Batch Date: 10-12-2011

Client ID: 141908821

Return Method: Email

Client Reference: Eagle Suspension / Hellmann Worl

Document Number	Document Detail	Number / Name	Page Count	Fee
392483620002	Find	Eagle Suspensions, Inc		\$1.00
392483620003	Find	Hellmann Worldwide Logi	stics	\$1.00
		Т	otal Fees:	<u>\$2.00</u>

Total Amount Charged to Client Account:

(Applies to documents or orders where Client Account is the payment method)

Note: This is not a bill. Please do not send any payments until the monthly statement is received. Any amount credited to Client Account may be refunded upon request. Refunds (if applicable) will be processed within 10 business days. Acknowledgement of Filing Document(s) (if present) is attached.

User ID: WEBSUBSCRIBER

Come visit us on the Internet @ http://www.sos.state.tx.us/
Phone: (512) 463-5555 FAX: (512) 463-5709 Dial: 7-1-1 for Relay Services

\$2.00

Case 3:	12-cv-00611-G Document 116 Filed 04/24/13 Page 152 of 178 PageID 2415
	Eagle 01.01 - Craig Stokley
	Parking 4 days @ \$ 8.00/day = \$ 32.00
	February 8th, 2013
:	March 18th, 2013 March 19th, 2013 Trial
	March 20th, 2013
	P's Appx. 149

PALTER STOKLEY SIMS WRIGHT PLLC

OPERATING ACCOUNT

2015

Alex Gamino

Date Type Reference 2/8/2013 Bill EAGL01-01 Parking Original Amt. Balance Due 5.00 5.00

2/27/2013 Discount

Payment 5.00

Check Amount

5.00

5.00

3

Riney, Palter PLLC Everett Zeller			12/15/2012 Page No.: 2
11/14/2012	Court Reporter - U.S. Legal Support Inv.#91369988 Deposition of Everett Zeller, Everett Zeller-Eagle Suspension & Everett Zeller-Dallas Spring	1.00	\$747.65
11/15/2012	Court Reporter - Constantin & Associates Inv.#3744 Deposition of John McConnell	1.00	\$640.30
11/16/2012	Texas Pictorial - Conference Room Rental on 11/16/12 Laredo, TX	1.00	\$150.00
11/20/2012	Travel Expense to Laredo, TX for John McConnell Deposition Airfare \$489.60, Hotel \$198.36, Internet \$10.77, Meals \$24.76	1.00	\$723.49
12/10/2012	Court Reporter - Alfonso DeLeon - Deposition of Jose Martinez on 11/16/12	1.00	\$1,294.00
		Total Expenses	\$3,555.44
Total New Cha	rges		\$5,160.44
Previous Balan	се		\$15,789.01
Total Payments	s and Credits		\$-15,789.01
Balance Due			\$5,160.44

Riney, Palter PLLC

Riney, Palte Everett Zelle					11/15/2012 Page No.: 3	
11/14/2012	NLM	Pursue exhibits for Deposition of Jose Martinez. Confer with Craig Stokley regarding same. Pursue strategy with Craig Stokley and Everett Zeller regarding case status and future action. Draft deposition outline.	4.00	\$225.00	\$900.00	0
11/14/2012	wcs	Defend Everett Zeller's deposition. Defend Corporate Representative of Dallas Spring's deposition. Defend Corporate Representative of Eagle Suspensions deposition. Multiple meetings regarding same. Prepare for John McConnell's deposition.	10.00	\$250.00	\$2,500.00	0
11/15/2012	NLM	Confer with Craig Stokley regarding deposition of John McConnell. Pursue strategy with Craig Stokley regarding deposition of Jose Martinez. Prepare exhibits for deposition of Jose Martinez. Revise deposition outline regarding same.	8.00	\$225.00	\$1,800.00)
11/15/2012	wcs	Prepare for and take deposition of John McConnell. Confer regarding same in preparation for Joe Martinez's deposition.	4.00	\$250.00	\$1,000.00)
Fee St Adjusti	ubtotal ments t	o Fees			\$17,307.5° \$-2,075.0°	0
				Total Fees	\$15,232.5	0
Expenses						
Start Date		Description		Quantity	Charge	
10/30/2012		EAGL01-01 Travel expenses on 10/30		1.00	\$26.6	5
11/06/2012		EAGL01-01 Travel expenses on 11/06		1.00	\$26.6	5
11/14/2012		Court Reporter - U.S. Legal Support Inv.#91369285 Depositions of Shirley Robinson		1.00	\$503.2	1
			Tot	tal Expenses	\$556.5	1
Total N	lew Cha	arges			\$15,789.0	_ 1
Previo	us Bala	nce			\$8,551.4	6
Total P	aymeni	ts and Credits			\$-8,551.4	6

Riney, Paiter PLLC Everett Zeller			1/15/2012 Page No.: 2
		Total Fees	\$3,250.00
Expenses		,	
Start Date	Description	Quantity	Charges
1/06/2012	EAGL01-01 Travel Expense to Fort Worth for Hearing 75 miles & \$3.00 parking	1.00	\$44.63
		Total Expenses	\$44.63
Total New Cha	rges		\$3,294.63
Previous Balar	се		\$0.00
Total Payment	s and Credits		\$-629.56
Balance Due			\$2,665.07
	ce of IOLTA Account		\$629.56
	oly Funds to AR		\$-629.56
New Balance o	f IOLTA Account		\$0.00

\$0.00



OfficeWax.

OfficeMax #415 SUITE 501 N. ARLINGTON, TX 76011 (817) 860-7052

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OMX Dur VW 3" Binder Black	\$10.99
OW Dur VW 3" Binder Black	\$19.99E
tuen VW 1" Binder 12/Pk Wh	\$29.99 E
Wels Mobile Mse 3500 Flame	\$39.99
# 20 Wireless Desktop Com 49000040869 7 7 2 1 / 1 Coa Cola Zero 2002	£\\$\$1.79
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08/24/12 8242012

1,250,00

Eagle suspensions' porton \$ 1250,00

RE: Eagle suspensions, Inc. V. Hellman worldwide Logistics Inc.

ause No. : 3:12-CV-0611-9

TOTALS

1,25000

Eagle Suspensions Inc.

1605 Lakeway Drive • Lewisville, TX 75057 (972) 219-8484 • (972) 219-3994 fax

CHECK NUMBER 11580

HPACEIDE THIS DOCUMENT HAS A COLORED BACKGROUND ON WHITE PAR

DATE 08128112 11580

Comerica

AMOUNT

PAY EXACTLY ONE thousand two hundred tifty \$ 00/100 1250 00

PAY ORDER OF

Abrams Mediation & Arbitration Inc. recas, southern & Central US, & East coast 4901 Lyndon B Johnson Treeway, she 150-Dallas, Tx 75244-6179

Eagle Suspensions Inc.

SECURITY FEATURES INCLUDED. DETAILS ON BACK.

P's Appx. 155

WL&ST19LN1 HERR BUSINESS FORMS + DENTON, TEXAS USA + 9404844547

Alfonso De Leon. Certified Shorthand and Stenomask Reporter

606 Idylwood Lane Laredo, Texas 78045 (956) 722-5677 Fax (956) 724-1696 ponchodeleon@sbcglobal.net

December 3, 2012

RINEY & PALTER Mr. Nathanial Martinez Attorney at Law 5954 Sherry Lane, Suite 1616 Dallas, Texas 75225

CAUSE NO. 3:12-CV-611-G, EAGLE SUSPENSIONS, INC. VERSUS HELMANN WORLDWIDE LOGISTICS, INC.

INVOICE # 3744

CONSTANTIN & ASSOCIATES

Certified Court Reporters

P.O. BOX 170597

ARLINGTON, TX 76003-0597

PHONE:

817-919-0167

FACSIMILE:

817-483-9446

DATE:

November 29, 2012

TO:

MR. W. CRAIG STOKLEY

Riney Palter, PLLC

5949 Sherry Lane, Suite 1616

Dallas, Texas 75225

RE: No

No. 3:12-CV-00611-G Eagle Suspensions, Inc.

vie.

Hellmann Worldwide Logistics, Inc.

For the oral deposition (including rough draft) of:

11/15/12

JOHN MCCONNELL

\$640.30

Thank you for your business!

Susan M. Constantin

RETURN THIS PORTION WITH PAYMENT

DUE DATE: UPON RECEIPT

AMOUNT DUE: \$6

\$640.30

MAIL TO:

CONSTANTIN & ASSOCIATES

Certified Court Reporters

P. O. BOX 170597

ARLINGTON, TX 76003-0597

INVOICE #3744

P's Anny 157

Case 3:12-cv-00611-G Document 116 Filed 04/24/13 Page 161 of 178 PageID 2424

Gail Spurgeon
Word for Word

Word for Word P.O. Box 181298 Dallas, Texas 75218-8298 Phone: 214 887 6300

Phone: 214.887.6300 Fax: 214.887.6303 **Invoice**

DATE

INVOICE #

8/24/2012

3029

BILL TO:

RINEY PALTER
W. CRAIG STOKELY
5949 SHERRY LANE
SUITE 1616
DALLAS TX 75225

DESCRIPTION

AMOUNT

CAUSE NO. 3:12-CV-00611-G EAGLE SUSPENSIONS, INC. VS. HELLMANN WORLDWIDE LOGISTICS, INC.

DEPOSITION OF (copy): 08/08/2012 JOHN RUSSELL

216.40

THANK YOU FOR YOUR BUSINESS!!!
INVOICE PAYABLE UPON RECEIPT.

TOTAL

S216.40



2611 East Elm Street Laredo, Texas 78043 724-7441 <> E-mail: depopro@stx.rr.com

INVOICE Number: 1373

Invoice Number: 137.

Oct 24, 2012

Page:

1

Nathanial Martinez Riney Palter, PLLC 5949 Sherry Lane, Suite 1616 Dallas, TX 75225-8009 Nathanial Martinez Riney Palter, PLLC 5949 Sherry Lane, Suite 1616 Dallas, TX 75225-8009

Gustone (II)		Texas Rictorial Employer DiNor : # 131	Payment I	emis (2)
MARTNAT-01			Net 30 Da	
Sales Rep (B)		Shipping Method 🖫 📜 🐺	Ship Date:	C Due Date
GONZGEO-01		US Mail		11/23/12
Quantity 22 2 3 2 3	em .	Description	e vinterica	Amount
1.00 PROSVC-C	IT	Process Service for Citations: Joes	65.00	65.00
		Martinez, 3:12-CV-611-G		
1.00 PROSVC-W	/ITFEE	Witness Fee	40.00	40.00
20.60 TRICHG		Round trip mileage charge.	0.55	11.33
1.00 POST-01		Postage and Handling	0.45	0.45
•				
		Subtotal		116.78
		Sales Tax		4.27
		Total Invoice Amount		121.05
Check/Credit Memo No:		Payment/Credit Applied		
C. Con a come monte i tor		TOTAL		121.05

Overdue invoices are subject to late charges.

TP Form 0001 Invoice II



2611 East Elm Street Laredo, Texas 78043

724-7441 E-mail: depopro@stx.rr.com



Nathanial Martinez Riney Palter, PLLC 5949 Sherry Lane, Suite 1616 Dallas, TX 75225-8009 Nathanial Martinez Riney Palter, PLLC 5949 Sherry Lane, Suite 1616 Dallas, TX 75225-8009

MARTNAT-)1	74-1894767		Net 30 D	ays	
		Shipping Method	Shipping Method		Due Date	
GONZGEO-		US Mail	ļ		12/16/12	
Quantity 1.00 RE	Item NCONFD	Description Conference Room Rental/Food & D		Unit Brice 150.00	Amount 150.00	
		Eagle Suspensions, Inc. VS Hellma Worldwide Logistics; Depo of Joe N 11-16-12				

Subtotal 150.00

Sales Tax

Total Invoice Amount 150.00

Payment/Credit Memo No:

Overdue invoices are subject to late charges.

Form W-9
(Rev. December 2011)
Department of the Treasury

Request for Taxpayer Identification Number and Certification

Give Form to the requester. Do not send to the IRS.

************	a novalizo de vico								
	Name (as shown on your income tax return)					·			
	George L. Gonzalez								
Business name/disregarded entity name, if different from above									
dba Texas Pictorial Check supremists how for federal tax classification:									
2	Check appropriate box for federal tax classification:								
Ö	Individual/sole proprietor Corporation Scorporation Partnership	☐ Trust/esta	ate				Į		
6 g							-	Exemp	t 63400
Print or type Specific instructions on	Limited liability company. Enter the tax classification (C=C corporation, S=S corporation, P=p:	ertnership)►	****			******		بانهبوا (r payee
돈	☐ Other (see instructions) ▶								
_ 粪	Address (number, street, and apt. or suite no.)	Reques	ter's	name	ಉರ ಜ	dress (d	ptions)	
ĕ	2611 E. Elm Street	ľ							
8	City, state, and ZIP code								
See	Laredo, TX 78043								
	List account number(s) here (optional)								
Pai									
Enter	your TIN in the appropriate box. The TIN provided must match the name given on the "N	lame" line	800	<u> </u>	curity	numbo	<u>' </u>		
to ave	old backup withholding. For individuals, this is your social security number (SSN). Howevent slien, sole proprietor, or disregarded entity, see the Part I instructions on page 3. For	er, icr a other			١.	. 1	_	11	1 1 1
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Purpose of Form

A person who is required to file an information return with the IRS must obtain your correct taxpayer identification number (TIN) to report, for example, income paid to you, real estate transactions, mortgage interest you paid, acquisition or abandonment of secured property, cancellation of debt, or contributions you made to an IRA.

Use Form W-9 only if you are a U.S. person (including a resident alien), to provide your correct TIN to the person requesting it (the requester) and, when applicable, to:

- 1. Certify that the TIN you are giving is correct (or you are waiting for a number to be issued),
- 2. Certify that you are not subject to backup withholding, or
- 3. Claim exemption from backup withholding if you are a U.S. exempt payes. If applicable, you are also certifying that as a U.S. person, your allocable share of any partnership income from a U.S. trade or business is not subject to the withholding tax on foreign partners' share of effectively connected income.

Definition of a U.S. person. For federal tax purposes, you are considered a U.S. person if you are:

- · An individual who is a U.S. citizen or U.S. resident alien,
- A partnership, corporation, company, or association created or organized in the United States or under the laws of the United States,
- . An estate (other than a foreign estate), or
- A domestic trust (as defined in Regulations section 301.7701-7).

Special rules for partnerships. Partnerships that conduct a trade or business in the United States are generally required to pay a withholding tax on any foreign partners' share of income from such business. Further, in certain cases where a Form W-9 has not been received, a partnership is required to presume that a partner is a foreign person, and pay the withholding tax. Therefore, if you are a U.S. person that is a partner in a partnership conducting a trade or business in the United States, provide Form W-9 to the partnership to establish your U.S. status and avoid withholding on your share of partnership income.

Form W-9 (Rev. 12-2011)

STATEMENT

U.S. Legal Support 363 N. Sam Houston Parkway East Suite 1200 Houston, TX 77060

Phone:713-653-7100 Fax:713-653-7143

Account No.	Date
C44019	12/3/2012

Current	30 Days	60 Days
\$747.65	\$0.00	\$0.00
90 Days	120 Days & Over	Total Due
\$0.00	\$0.00	\$747.65

Page 1 of 1

Craig Stokley
Riney Palter, PLLC
5949 Sherry Lane
Suite 1616
Dallas, TX 75225-8009

C-la Chalden

Invoice Date	Invoice No.	Balance	Job Date	Witness	Case Name
11/29/2012	91369988	747.65	11/14/2012	Everett Zeller-Dallas Spring	Eagle Suspensions, Inc. v. Hellmann Worldwide Logistics, Inc.
Î					
)					

Tax ID: 76-0523238 Phone: 214-461-1200 Fax:214-461-1210

Please detach bottom portion and return with payment.

Craig Stokley Riney Palter, PLLC 5949 Sherry Lane Suite 1616

Dallas, TX 75225-8009

Account No. : C44019

Date : 12/3/2012

Total Due : \$ 747.65

Remit To: U.S. Legal Support

Texas Records & Reporting

P.O. Box 952172 Dallas, TX 75395-2172

INVOICE

U.S. Legal Support 5910 N. Central Expressway Suite 100 Dallas, TX 75206 Phone:214-741-6001 Fax:214-741-6824

> **Craig Stokley** Riney Palter, PLLC 5949 Sherry Lane Suite 1616 Dallas, TX 75225-8009

Invoice No.	Invoice Date	Job No.
91369988	11/29/2012 13456	
Job Date	Case No.	
11/14/2012	3:12-CV-611-G	
	Case Name	
Eagle Suspensions Inc.	, Inc. v. Hellmann Worl	dwide Logistics,
	Payment Terms	
Due upon receipt		

1 CERTIFIED COPY OF TRANSCRIPT OF: Everett Zeller		263.23
1 CERTIFIED COPY OF TRANSCRIPT OF: Everett Zeller-Eagle Suspensions		232.29
1 CERTIFIED COPY OF TRANSCRIPT OF:		
Everett Zeller-Dallas Spring		252.13
	TOTAL DUE >>>	\$747.65
	AFTER 1/13/2013 PAY	\$822.42
Thank you. We appreciate your business. Please call us @ 214-741-6001 X 4341 if you have any billing questions.		
Please contact us immediately with questions or corrections regarding No adjustments or refunds will be made after 120 days from date	billing or payment. e of payments.	
Tax ID: 76-0523238	Phone: 214-461-1200	Fax:214-461-1210

Please detach bottom portion and return with payment.

Craig Stokley Riney Palter, PLLC 5949 Sherry Lane **Suite 1616** Dallas, TX 75225-8009

Tax ID: 76-0523238

Remit To: U.S. Legal Support **Texas Records & Reporting** P.O. Box 952172 Dallas, TX 75395-2172

BU ID :2-DAL : 134568 Job No.

Case No. : 3:12-CV-611-G

Case Name : Eagle Suspensions, Inc. v. Hellmann Worldwide

Logistics, Inc.

Invoice Date : 11/29/2012 Invoice No. : 91369988

Total Due : \$ 747.65 AFTER 1/13/2013 PAY \$822.42

PAYMENT WITH O	CREDIT CARD	AMEX	VISA
Cardholder's Name:			
Card Number:			
Exp. Date:	Phon	e#:	
Billing Address:			
Zip:	Card Security C	ode:	
Amount to Charge:			
Cardholder's Signatu	ıre:		

TAB 2

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

EAGLE SUSPENSIONS, INC.,	§	
	§	
Plaintiff,	§	
·	§	
v.	§	Civil Action No. 3:12-CV-00611-G
	§	
HELLMANN WORLDWIDE	§	JURY
LOGISTICS, INC.,	§	
·	Š	
Defendant.	§	

DECLARATION OF JOHN T. PALTER

- 1. My name is John T. Palter. I am over the age of 21, am of sound mind, and suffer from no legal or mental disabilities. I have never been convicted of a felony or a crime involving moral turpitude. I am fully competent to testify on the facts stated herein, which are within my personal knowledge, and are true and correct. I submit this declaration in support of Plaintiff Eagle Suspensions, Inc.'s ("Eagle") Motion for Attorneys' Fees ("Motion").
- 2. I am a founding member of the law firm of Palter Stokley Sims Wright, PLLC ("PSSW"), attorneys for Plaintiff Eagle in this matter. Prior to that time, I served as Managing Member of the law firm of Riney Palter, PLLC.
- 3. I have been practicing law for more than twenty years. I have a wide range of experience advocating the interests of individual, emerging growth, and institutional clients in complex commercial, employment and intellectual property disputes. I have served as lead and local counsel in numerous jury and bench trials and arbitrations in cases involving securities, accounting, intellectual property, copyright and trademark infringement, trade secrets, non-compete agreements, employment, insurance coverage, oil and gas, dissenter's rights, deceptive

trade practices, quasi-torts, and pre- and post-judgment collections.

- 4. I graduated from Drake University School of Law in 1985 and I am admitted to practice in the State of Texas, State of New Mexico, United States Supreme Court, United States Court of Appeals for the Fifth Circuit and Federal Circuit, as well as the United States District Courts for the Northern, Southern, Eastern, and Western Districts of Texas.
- 5. In preparation of the statements and opinions set forth in this Declaration, I have reviewed Eagle's Motion for Attorneys' Fees and Costs and the declaration of W. Craig Stokley and Exhibit "B" attached thereto including the related fee statements and cost records.
- 6. In connection with my opinions set forth in this declaration, I have considered the following factors:
 - a. the time and labor required, the novelty and difficulty of the questions involved, and the skill required to perform the legal service properly;
 - b. the likelihood that the acceptance of the particular employment will preclude other employment by the lawyer;
 - c. the fee customarily charged in the locality for similar legal services;
 - d. the amount involved and the results obtained;
 - e. the time limitations imposed by the client or by the circumstances;
 - f. the nature and length of the professional relationship with the client;
 - g. the experience, reputation, and ability of the lawyer or lawyers performing the services; and
 - h. whether the fee is fixed or contingent on results obtained or uncertainty of collection before the legal services have been rendered.
 - 7. I am familiar with hourly rates charged in Dallas County for business litigation

matters in both state and federal court, including matters similar to this case. I am familiar with the hourly rates of first year associates up to senior partners at various law firms, as well as legal assistants, including those in Dallas County. The hourly rates for attorneys at PSSW and Riney Palter, PLLC range from \$375-\$395 for members, \$175-\$250 for associates and \$175 for paralegal. It is my opinion that the hourly rates charged by PSSW and Riney Palter, PLLC to Eagle in this matter are reasonable in this Dallas, Texas Area.

- 8. I understand that Plantiff's attorneys worked approximately 1090.8 hours, and that paralegals worked approximately 154.6 hours in connection with the successful prosecution of this case through Final Judgment. This legal work including the (i) investigation of the factual and legal basis for the claims, including anticipated defenses; (ii) preparation of demand letters in an attempt to resolve the matter without filing of a lawsuit; (iii) researching, drafting and filing of the original and amended complaints; (iv) preparation and response to written discovery and oral depositions, including document review, disclosures, objections and related work; (v) motion practice including the preparation and filing of a motion for summary judgment prosecution; (vii) responding to defendant's motion for summary judgment; (viii) preparation of the pretrial order including exhibits and witness lists and disclosures; (ix) preparation for and attendance at the jury trial; and (x) preparation of the final judgment.
- 9. Based upon my personal involvement in the prosecution of Eagle's claims against Hellmann, my review of the billing records and expense documentation, and my experience as a trial attorney in Dallas County, it is my opinion that the sum \$240,466 is a reasonable, necessary, usual and customary fee in Dallas County for the prosecution of this case through the entry of a final judgment after trial before this court.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on April 24, 2013.

OHN T. PALTER

TAB 3

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

EAGLE SUSPENSIONS, INC.,	§
Plaintiff,	§ § §
v.	§ Civil Action No. 3:12-CV-00611-G
	§
HELLMANN WORLDWIDE	§ JURY
LOGISTICS, INC.,	§
Defendant.	§ 8
Detendant.	8

DECLARATION OF NATHANIAL L. MARTINEZ

- 1. My name is Nathanial L. Martinez. I am over the age of 21, am of sound mind, and suffer from no legal or mental disabilities. I have never been convicted of a felony or a crime involving moral turpitude. I am fully competent to testify on the facts stated herein, which are within my personal knowledge, and are true and correct. I submit this declaration in support of Plaintiff Eagle Suspensions, Inc.'s ("Eagle") Motion for Attorneys' Fees ("Motion").
- 2. I am an associate attorney at the law firm of Palter Stokley Sims Wright, PLLC ("PSSW"), attorneys for Plaintiff Eagle in this matter.
- 3. I have been practicing law in Texas since 2010. Since then, I have gained experience in complex commercial litigation in both state and federal court in areas of general contract and business tort law. My experience includes pursuing and defending claims for breach of contract, breach of fiduciary duty, fraud, trademark infringement, unfair competition, tortious interference, conspiracy, and misappropriation of trade secrets. I also have experience in constitutional law, employment discrimination, and trust and estate litigation.
 - 4. I received my Bachelor of Arts degree in Government from The University of

Texas at Austin in 2006, with a minor in Philosophy. I received my law degree from the J.

Reuben Clark Law School at Brigham Young University in Provo, Utah, graduating in 2010. I

am admitted to practice in the State of Texas and the United States District courts in the

Northern, Southern, Eastern, and Western Districts of Texas.

5. I have reviewed Eagle's Motion for Attorneys' Fees and Costs, the declaration of

W. Craig Stokley (and attached billing statements and accounting records), and the declaration of

John T. Palter. Based upon my involvement in the prosecution of Eagle's claims against

Hellmann and my experience as an attorney, I believe the amount of attorneys' fees sought by

Eagle are reasonable and necessary in this matter. Furthermore, I agree with the statements and

opinions expressed by Mr. Stokley (including Mr. Stokley's summary of my legal experience)

and Mr. Palter in their respective declarations.

6. I am familiar with hourly rates charged in Dallas County for business litigation

matters in both state and federal court, including matters similar to this case. I am generally

familiar with the hourly rates of first year associates up to senior partners at various law firms, as

well as legal assistants, including those in Dallas County. It is my opinion that the hourly rates

charged by PSSW and Riney Palter, PLLC to Eagle in this matter are reasonable.

7. Based upon the foregoing, it is my opinion that the attorneys' fees and costs

sought in connection with Eagle's Motion for Attorneys' Fees are usual and customary. Further,

it is my testimony that the attorneys' fees and costs were reasonable and necessary to the

successful outcome of this case.

I declare under penalty of perjury that the foregoing is true and correct,

EXECUTED on April 24, 2013.

NATHANIAL L. MARTINEZ

TAB 4

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

EAGLE SUSPENSIONS, INC.,	§
Plaintiff,	& & &
v.	§ Civil Action No. 3:12-CV-00611-G
	Š
HELLMANN WORLDWIDE	§ JURY
LOGISTICS, INC.,	§
Defendant.	§ §

DECLARATION OF EVERETT ZELLER

- 1. My name is Everett Zeller. I am over the age of 21, am of sound mind, and suffer from no legal or mental disabilities. I have never been convicted of a felony offense or a crime involving moral turpitude. I am fully competent to testify on the facts stated herein, which are within my personal knowledge, and are true and correct.
- 2. I am the Vice-President of Eagle Suspensions, Inc. ("Eagle"). Eagle is a spring manufacturer whose main plant is located in Durant, Oklahoma. Eagle utilizes large industrial presses, among other equipment, to fabricate leaf springs for suspension systems in vehicles such as cars, trucks, and trailers of all sizes. On behalf of Eagle, I engaged Riney Palter, PLLC ("Riney Palter") to represent Eagle in its claims against Hellmann Worldwide Logistics, Inc. ("Hellmann"). In January 2013, as this case was drawing closer to trial, I requested and authorized the transfer of Eagle's engagement with Riney Palter to Palter Stokley Sims Wright, PLLC ("PSSW").
- 3. In this matter I directed the lead attorney on this case, W. Craig Stokley, to send Hellmann a demand letter on Eagle's behalf due to Hellmann's failure to ship two large

industrial presses from Mexico to Durant, Oklahoma. I also directed Mr. Stokley to engage in pre-suit discovery regarding potential claims against Hellmann, which included taking the deposition of Hellmann's Corporate Representative, David Kang.

- 4. When it became clear, based on Mr. Kang's testimony, that the shipment of the presses was lost due to Hellmann's actions and/or inactions, I directed Mr. Stokley to file a lawsuit on behalf of Eagle against Hellmann to recover Eagle's damages and attorneys' fees.
- 5. Because Hellmann would not make Eagle whole for its damages and attorneys' fees, on behalf of Eagle, I requested that Mr. Stokley proceed to trial against Hellmann in order to attempt to recover the damages and attorneys' fees suffered by Eagle due to Hellmann's wrongful conduct.
- 6. I was present during all three days of trial. Eagle prevailed at trial. In addition to the damages that were awarded by the jury, Eagle has incurred and been billed attorneys' fees in this case, which total \$240,466 as of April 11, 2013. Eagle has also incurred and been billed expenses in the amount of \$8,491.14 as of April 11, 2013. Eagle has paid every invoice in its ordinary course of paying invoices as they are received. The only invoice that has not currently been paid is the one that was received for time billed from April 1 through April 11, 2013. This invoice, and any others, will be paid in Eagle's ordinary course of business.
- 7. I understand that the Court has the authority to award Eagle its reasonable attorneys' fees in this case. It is my opinion that the hourly rates charged by Riney Palter and PSSW in this case are reasonable, especially given the successful outcome of the case. It is my opinion that Craig Stokley properly staffed this case. I am satisfied with the representation provided by PSSW and Riney Palter, PLLC to Eagle in this case. PSSW did a great job preparing this case for trial and then successfully conducting the trial. With the exception of the

most recent invoices, Eagle has paid all outstanding invoices from Riney Palter and PSSW in this matter. It is my opinion that the attorneys' fees charged by PSSW in this case are reasonable and were necessary to the successful prosecution of Eagle's claims in this case.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on April 24, 2013.

Event Zeller
EVERETT ZELLER